



## Risk Management Plan

This Risk Management Plan has been agreed to under the Authority of the Risk Management Official appointed for the Municipality of Centre Wellington under By-law 2016-22 pursuant to section 58(5) of the *Clean Water Act*, 2006 (the "CWA"). This Risk Management Plan was developed in accordance with the CWA, Section 58, Ontario Regulation 287/07 and the Grand River Source Protection Plan.

Wellington Source Water Protection is a municipal partnership between the Township of Centre Wellington | Town of Erin | Guelph / Eramosa Township | Township of Mapleton | Town of Minto | Township of Puslinch | Township of Wellington North | County of Wellington. The purpose of the *Clean Water Act* is to protect existing and future sources of drinking water.

### 1.0 Property and Contact Information

**RMP and Notice Number:** TCW-GR-EL-23-038

**RMP Purpose:** Risk Management Plan required due to Stormwater Management, Application Of Road Salt, Storage Of Road Salt, Storage Of Snow

**RMP Location:** Block 39 of Youngblood Subdivision, Elora, Ontario

**Facility Operator:** 1235876 Ontario Limited

**Email:** terrygranite@gmail.com

**Parcel ID:** 020323039      **WHPA:** WHPA-C, ICA

**Vulnerability Score:** 6, Chloride    **Threats:** Application Of Road Salt, Storage Of Road Salt, Storage Of Snow

**Property Address:** Block 39 of Youngblood Subdivision, Elora, Ontario    **Town:** Elora

**Municipality:** Township of Centre Wellington    **Province:** Ontario

**Postal Code:** N0B1S0

**Source Protection Plan:** Grand River    **Drinking Water System:** Fergus-Elora

### Property Owner Information

**Name:** 1235876 Ontario Limited

**Mailing Address:** 7 Edinburgh Road South

**Town:** Guelph

**Province:** Ontario    **Postal Code:** N1H 5N8

**Phone:** 519-822-3988

**Email:** terrygranite@gmail.com

## 2.0 Applicable Policy Requirement – Grand River Source Protection Plan

The following text outlines the relevant policy requirement from the Grand River Source Protection Plan, approved October 16, 2015 and effective on July 1, 2016 which establishes the requirements for this Risk Management Plan.

### ***WC-CW-12.2 - Risk Management Plan for the Application of Road Salt***

*To ensure any existing or future application of road salt ceases to be or never becomes a significant drinking water, this activity shall be designated for the purpose of Section 58 of the Clean Water Act, 2006, and a Risk Management Plan shall be required where all of the following applies:*

- a. the activity is or would be a significant drinking water threat;*
- b. salt is or could be applied to the property;*
- c. the salt application area is equal to or greater than 200 square metres or 8 parking spots; and*
- d. the property is used for any land uses except residential consisting of four units or fewer.*

*Notwithstanding the above, a Risk Management Plan will also be required for any municipal properties where the activity is or would be a significant drinking water threat.*

### ***WC-CW-13.2.2 - Risk Management Plan for the Handling and Storage of Road Salt***

*To ensure the 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 within a Chloride ICA, this activity shall be designated for the purpose of Section 58 of the Clean Water Act, 2006 and a Risk Management Plan shall be required where the following apply:*

- a. any existing or future handling and storage of road salt, outside of a WHPA-A, in any amount that is stored uncovered; or*
- b. any existing or future handling and storage of road salt, outside of a WHPA-A, in covered storage in amounts greater than 100 kilograms; or*
- c. any existing or future handling and storage of road salt, for a property that requires a salt application Risk Management Plan, in uncovered or covered storage of any amount; or*
- d. any existing or future handling and storage of road salt at a municipal property, in uncovered or covered storage of any amount.*

### ***WC-CW-14.5 - Risk Management Plan for the Storage of Snow***

*To ensure any existing or future facility for snow storage ceases to be or never becomes a significant drinking water threat, where this activity is or would be a significant drinking water threat within a Chloride ICA, this activity shall be designated for the purpose of Section 58 of the Clean Water Act, 2006 and a Risk Management Plan shall be required where all of the following apply:*

- a. a prohibition policy does not apply;*
- b. salt is or could be applied to the property;*
- c. the salt application area is equal to or greater than 200 square metres or 8 parking spots; and*
- d. the property is used for any land uses except residential consisting of four units or fewer.*

Once a Source Protection Plan is effective, it is the legal document that outlines the requirements to implement the *Clean Water Act* and associated Regulations in that watershed.

For further information on the Grand River Source Protection Plan, please refer to either <https://www.sourcewaterinfo.on.ca/> or [www.wellingtonwater.ca](http://www.wellingtonwater.ca).

## **3.0 Risk Management Plan Contents**

This Risk Management Plan is in response to an existing use under Grand River Source Protection Plan. Please note that the Risk Management Plan requirements are outlined in Section 3.2, and in the Appendices, which are incorporated by reference and form part of this Risk Management Plan.

### **3.1 Review of Drinking Water Threat Activities**

As shown on Figure 1, the subject property is located completely within the Wellhead Protection Area C (WHPA-C, 5-year time-of-travel) for the Township of Centre Wellington - Elora-Fergus wells. The groundwater vulnerability score is 6, or high, for the WHPA-C. The property is also in the Issue Contributing Area (ICA) for Chloride.

For this property, Application Of Road Salt, Storage Of Road Salt, Storage Of Snow would be considered significant drinking water threats as defined by the *Clean Water Act* and associated regulations. A number of other activities, however, would be considered moderate or low threats. These would include, but not limited to fuel storage and pesticides/fertilizer application / storage / handling.

### 3.2 Risk Management Plan Requirements

RMP Requirements are outlined in the Appendices and form part of the Risk Management Plan and only relate to significant drinking water threats (hereinafter referred to as "RMP Requirements"). The RMP Requirements listed in the Appendices are legally enforceable binding requirements once the Risk Management Plan has been issued.

For clarity, the following significant drinking water threat activities are subject to the enforceable requirements of this Risk Management Plan:

- Application Of Road Salt
- Storage Of Road Salt
- Storage Of Snow

### 4.0 Risk Management Plan Approval and Enforcement

1. As per Section 58 (15) of the *Clean Water Act*, by agreeing to this Risk Management Plan, the Risk Management Official is satisfied that the Risk Management Plan complies with the requirements, if any, of the regulations, rules and source protection plan and that the activity will not be a significant drinking water threat if it is engaged in at that location in accordance with the Risk Management Plan.
2. Pursuant to Section 60, Ontario Regulation 287/07 under the *Clean Water Act*, this Risk Management Plan cannot be transferred to another person or organization without the consent of the Risk Management Official.
3. The responsible party acknowledges that this Risk Management Plan was mutually agreed upon between the responsible party and the Risk Management Official and agree to abide by the terms of this plan as per Section 58 (18) of the *Clean Water Act*
4. Failure to comply with all the requirements of an approved Risk Management Plan may result in enforcement action by the Risk Management Official / Inspector.
5. A Risk Management Inspector may conduct an inspection at any time in order to verify compliance with the conditions of the Risk Management Plan.
6. This Risk Management Plan remains in effect until such time that a notice is received from the Risk Management Official deeming that a Risk Management Plan is no longer required or amendments to the Risk Management Plan are either agreed to or established.



7. Pursuant to Section 53 (3), Ontario Regulation 287/07 under the *Clean Water Act*, this Risk Management Plan, once agreed to (or established) is a public document. All information submitted for development of this Risk Management Plan is subject to the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA).
8. The Risk Management Official may routinely review and update this Risk Management Plan as required.
9. Pursuant to Section 58 of the *Clean Water Act*, this Risk Management Plan has been agreed to by the responsible party and the Risk Management Official.



**Warning / Disclaimer: Notwithstanding the inclusion of provisions in the RMP intended to address threats other than significant threats, neither the RMO nor the Township of make any warranties with respect to the adequacy of the RMP to address issues of public or private liability or ensure compliance with any federal or provincial environmental legislation, other than the CWA. Compliance with the RMP should not be relied upon for those purposes or any other purposes beyond the ambit of the CWA.**

**The Risk Management Plan is in effect as of the date it is signed by the Risk Management Official**

**Company / Person engaging in activity:** Terry Ellery obo 1235876 Ontario Limited

**Signature:**

**Date:**

A handwritten signature in black ink, appearing to read "Terry Ellery".

Aug 16, 2023

[Terry Ellery \(Aug 16, 2023 10:34 EDT\)](#)

**Risk Management Official, Township of Centre Wellington:** Kyle Davis

**Signature:**

**Date:**

A handwritten signature in black ink, appearing to read "Kyle Davis".

Aug 16, 2023

**Appendices:**

Figure 1: Property and Wellhead Protection Areas

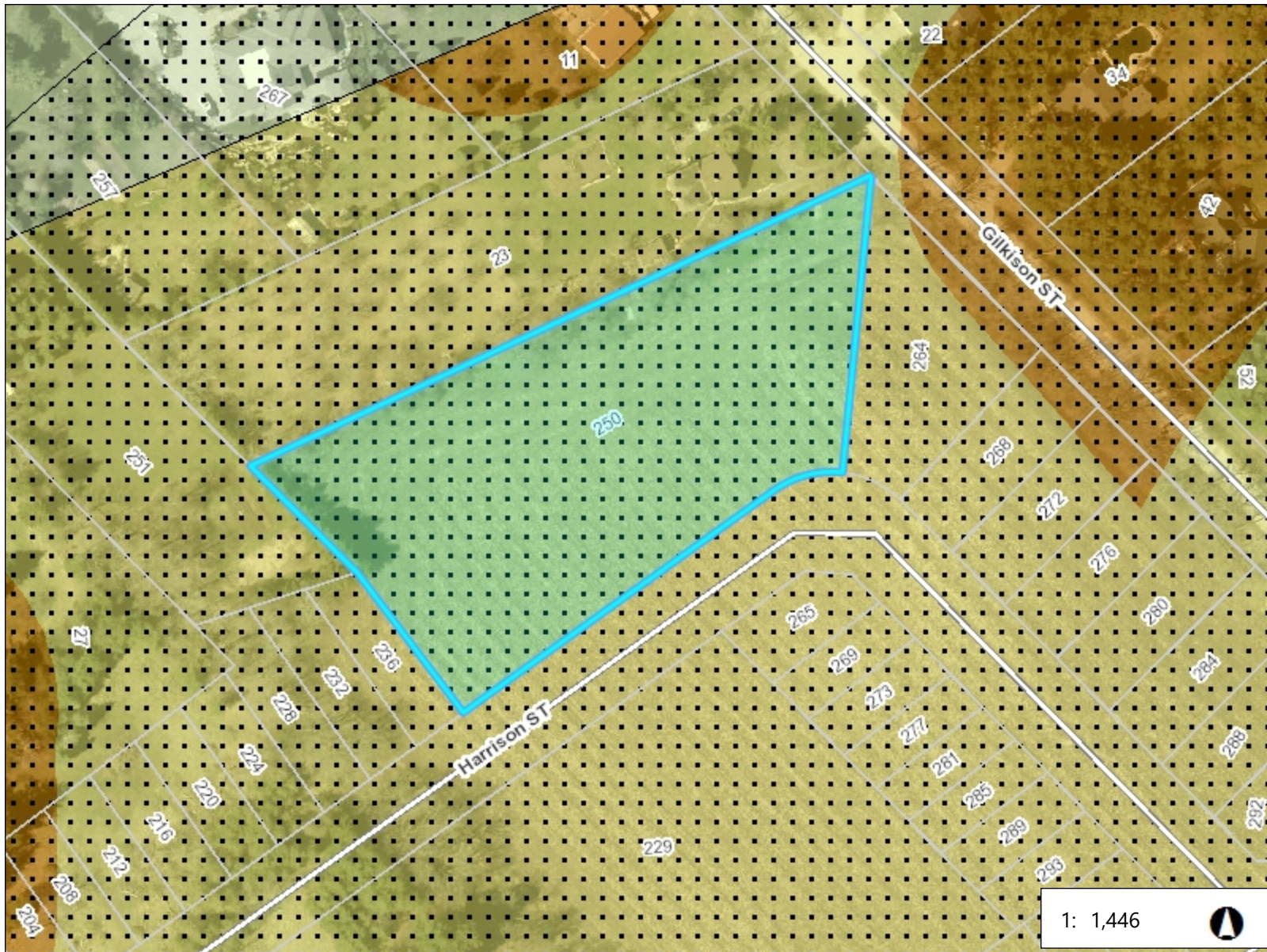
Figure 2: Winter Maintenance Site Map

Appendix A: Risk Management Plan Requirements – General

Appendix B: Risk Management Plan Requirements – Winter Maintenance

Appendix C: Spill Prevention and Response Plan





Legend

- Parcels
- Roads
  - Local Road
  - County Road
  - Highway
- Well Locations
  - Existing
  - Proposed
- Issue Contributing Area
  - Chloride
  - Nitrate
  - Sodium
  - TCE
- Wellhead Protection Area
  - A
  - B
  - C
  - D
- Vulnerability Score
  - 10
  - 8, D; 8; 8, C
  - 2, 4, 6 (A, B or C)
  - 2, 4, 6, D; 2, 4, D; 2, 4, 6 (D); 4, D; 6,
- RoadsLookup

1: 1,446

0.1 0 0.04 0.1 Kilometers

This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. Produced using information under License with the Grand River Conservation Authority. Copyright © Grand River Conservation Authority, 2022.

THIS IS NOT SURVEY DATA. Parcels - Teranet 2002, Wellington County 2022

Notes

# Appendix A: Risk Management Plan Requirements – General

**RMP Number:** TCW-GR-EL-23-038

## **Definitions**

The responsible party is defined as: 1235876 Ontario Limited

The site is defined as: Block 39 of Youngblood Subdivision, Elora, Ontario  
(Parcel ID: 020323039)

A reportable spill is defined pursuant to the Environmental Protection Act, as may be amended from time to time. For reference the definition of a reportable spill is provided below, however, the current version in the above referenced Act takes precedence. A reportable spill is defined as a discharge of a pollutant into the natural environment, from or out of a structure, vehicle or other container and that is abnormal in quality or quantity in light of all the circumstances of the discharge.

## **The responsible party shall ensure the following:**

### **Administrative**

#### GEN.1

If the property ownership changes, the responsible party shall provide written notice to the Risk Management Official (RMO) within 30 days of the ownership transfer.

#### GEN.2

The responsible party shall ensure the condominium by-laws include a requirement that this Risk Management Plan be transferred to the condominium board before the date the condominium board becomes responsible for the site.

#### GEN.3

Once the Risk Management Plan with the condominium board is established, the Risk Management Official shall issue a written notice amending or revoking this Risk Management Plan, as required.

### **Training**

#### GEN.4

Introductory training sessions for new employees/contractors shall include an overview of Source Water Protection, why it is important, the location of the local drinking water source and vulnerable areas, and information about activities or products at the facility that may pose a



significant threat to the drinking water source. The measures in the Risk Management Plan will be reviewed and staff responsibilities will be explained.

GEN.5

Employees / contractors responsible for spill response shall be trained to understand the contents of the Spill Response Plan and know the location and proper use of spill response supplies and personal protective equipment. Employee training shall be refreshed periodically as set out in the Spill Response Plan.

GEN.6

Employees shall be trained whenever new equipment is installed, new procedures are implemented, or new products are introduced. They should be familiar with the hazards associated with the material they are using and be aware of potential sources of contamination.

**Internal Monitoring / Inspections**

GEN.7

Monthly inspections shall be conducted on the schedule set out in this plan. A log shall be maintained, and made available to the RMO / RMI upon request, that includes the following:

- the date and person(s) responsible for the inspections
- condition of all items inspected
- condition of leak detection and spills prevention systems (valves, overfill protection, secondary containment, etc.) where applicable.

**Record Keeping**

GEN.8

All records required as part of this Risk Management Plan, including employee training, shall be available for a period of five (5) years from date of creation and made available to Risk Management Official and / or Risk Management Inspector (RMO / RMI) upon request.

GEN.9

Up-to-date Safety Data Sheet(s) (SDS), available from the product's supplier, shall be maintained and available.

**Spill Prevention and Response Plan**

GEN.10

The responsible party shall maintain and implement a Spill Prevention and Response Plan that specifies:

- a) the contents and location of the on-site spill response kit(s),
- b) the specific procedures to be followed by the operator and/or staff in the event of any spill, reportable and non-reportable
- c) definition of reportable & non-reportable spills
- d) contact information and protocol for reporting a reportable spill event to the SAC as well as the RMO/RMI,

- e) procedures and forms for recording and reporting details about a reportable and non-reportable spill event,
- f) the frequency of spill response training to be completed by staff,
- g) procedure for receiving reportable and non-reportable spill events and recommending corrective actions to prevent a spill reoccurrence. The corrective actions and record of reportable and/or non-reportable spills shall be maintained,
- h) contact information for the waste company referenced above and if required, a spill response contractor and

GEN.11

Spill response procedures, including the Spills Action Centre number (1-800-268-6060), shall be posted in an easy to find and read location for staff to use in the event of a spill.

# Appendix B: Risk Management Plan Requirements – Winter Maintenance

**RMP Number:** TCW-GR-EL-23-038

## **Definitions**

The responsible party is defined as: 1235876 Ontario Limited

The site is defined as: Block 39 of Youngblood Subdivision, Elora, Ontario  
(Parcel ID: 020323039)

A reportable spill is defined pursuant to the Environmental Protection Act, as may be amended from time to time. For reference the definition of a reportable spill is provided below, however, the current version in the above referenced Act takes precedence. A reportable spill is defined as a discharge of a pollutant into the natural environment, from or out of a structure, vehicle or other container and that is abnormal in quality or quantity in light of all the circumstances of the discharge.

**The responsible party shall ensure the following:**

### **Onsite Conditions and Maintenance**

#### **SALT.1**

The property shall have a Winter Maintenance Site Map that outlines the locations of:

- winter maintenance chemical application
- storage areas (including maximum amount and state stored at each location on the site)
- state (dry/solid or liquid)
- snow storage areas
- drains, downspouts, and potential migratory pathways (i.e. wells, ditches, depressions, storm sewers, etc.)
- areas to be closed off during winter maintenance season

A copy of the Winter Maintenance Site Map shall be in an accessible location and once completed shall form part of this Risk Management Plan as Figure 2. The Winter Maintenance Site Map shall be reviewed annually and updated whenever any of the information pertaining to the content of the Winter Maintenance Site Map has changed. The Winter Maintenance Site Map shall include a version number and date. The Winter Maintenance Site Map shall be submitted to the Risk Management Official within sixty (60) days of the first date of occupancy. Subsequent updates of the Winter Maintenance Site Map shall be maintained on site and made available upon request.

#### SALT.2

Roof gutters and downspouts shall be directed away from or under paved or impermeable areas. If runoff to paved surfaces cannot be mitigated in this manner, directing roof runoff directly into storm sewers shall be considered.

#### SALT.3

All pavement on the subject property shall be maintained to prevent areas of ponding water, and allow for complete snow removal. Newly paved areas on the subject property shall be graded to prevent ponding.

#### SALT.4

Low traffic, under used, or high-risk areas, walkways, and entrances shall be closed during the winter maintenance season. Examples include, but are not limited to, overflow parking areas, seasonal walkways, or redundant stairways.

#### SALT.5

Remove areas of drifting snow to ensure that reapplication of winter maintenance chemicals does not become necessary.

#### SALT.6

Clean up excess applied winter maintenance chemical by May 1 each year. Document amount of winter maintenance chemical retained once the season is completed.

#### SALT.7

Prepare and implement a winter maintenance plan for temperatures below -10°C, when salt is less effective. Use an alternative to dry sodium chloride (rock salt) when current and forecasted temperatures is lower than -10 degrees Celsius (alternatives include Magnesium Chloride, Calcium Chloride, Calcium Magnesium Acetate, Potassium Acetate, plant-based additives, or abrasives).

### **Winter Maintenance Contract**

#### SALT.8

The owner shall notify the RMO of whether winter maintenance is to be dealt with in-house, or if a contractor will be hired within 30 days of date of signing the contract, if applicable. If a contract is to be negotiated with a contractor, the following measures two will be required:

- a) When a new winter maintenance contract is negotiated, a written agreement stating that the contractor understands, and will implement, the terms of the RMP will be signed by the contractor and property owner/manager at the time of contractor hire. A copy of the agreement shall be made available upon request by RMO/RMI.

- b) New winter maintenance contracts shall ensure that payment for road salt application services on the subject property is not based upon on the total amount of salt used.

To encourage contractors to use less salt, the basis of payment for new contracts can be unit price per event or lump sum per season.

### **Certification and Training**

#### **SALT.9**

Any person responsible for winter maintenance chemical application shall complete the Smart About Salt™ training or equivalent and renew every 5 years. In addition, winter maintenance contractors will be required to maintain Smart About Salt™ certification or equivalent. In lieu of Smart About Salt™ training or certification, the responsible party is required to obtain agreement in writing from the RMO on an equivalent training or certification.

#### **SALT.10**

All onsite staff applying winter maintenance chemicals shall be provided with annual orientation training based on practices outlined in Transportation Association of Canada's entitled: Syntheses of Best Practices Road Salt Management (specifically Chapter 10 - Salt Use on Private Roads, Parking Lots and Walkways).

<https://www.tac-atc.ca/sites/tac-atc.ca/files/site/doc/resources/roadsalt-10.pdf>

### **Winter Maintenance Chemical Application**

#### **SALT.11**

Snow shall be cleared prior to winter maintenance chemical application in order to maximize the effectiveness and minimize the quantity of product that needs to be applied.

#### **SALT.12**

Product application practices and rates shall be adjusted to suit current and forecasted conditions for each product application event. The amount of residual road salt on the impervious areas will be assessed prior to product application and removed where excessive application has occurred.

#### **SALT.13**

Product application practices shall be annually reviewed to identify potential reductions in material use.

### **Winter Maintenance Chemical Handling and Storage**

#### **SALT.14**

Winter maintenance chemical containers shall be stored in a location that minimizes risk of spills due to collisions with vehicles, equipment, or other hazards and located away from floor drains, cracks, catch basins, ditches or any other potential pathways to groundwater or surface water.

#### **SALT.15**

Uncovered or damaged, outside storage of winter maintenance chemicals is prohibited.



## **Snow Storage**

### **SALT.16**

Snow storage area(s) shall be located, where possible:

- directly up-gradient of, and close to, a catch basin to minimize meltwater runoff
- on the low side of paved areas to alleviate reicing as a result of meltwater
- so as not to obstruct drainage (i.e. on top of catch basin grates, in ditches etc.)
- so as not to impede the operations associated with Emergency Services (i.e. in front of fire hydrants, in fire lanes, etc.).

### **SALT.17**

Litter, debris, salt and sediment from snow storage areas and site shall be collected and disposed of at the end of every winter maintenance season to prevent these materials from being released into the environment through precipitation, runoff, and snowmelt.









# TCW-GR-FE-23-038\_RMP\_

Final Audit Report

2023-08-16

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|-----------------|--|
| Created:        | 2023-08-16   |
| By:             | Emily Vandermeulen (EVandermeulen@centrewellington.ca) |
| Status:         | Signed   |
| Transaction ID: | CBJCHBCAABAA-TOEgyhwuFy-7EqniAl63-Plvnepwab6           |

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-  Document emailed to Terry Ellery (terrygranite@gmail.com) for signature  
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