

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
<b>WST-1</b> <b>Delete</b>	Storage of Hazardous or Liquid Industrial Waste at Disposal Sites  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	MOE	€	<b>Prescribed Instrument</b>  <del>Where the storage of hazardous or liquid industrial waste or 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 that require an approval under the Environmental Protection Act is in an area where the activity is, or would be, a significant drinking water threat, the Environmental Compliance Approval that governs the activity shall be reviewed to ensure appropriate terms and conditions are included so that the activity ceases to be, or does not become, a significant drinking water threat in any of the following areas:</del>  <ul style="list-style-type: none"> <li>• <del>WHPA-A (existing, future); or</del></li> <li>• <del>WHPA-B (VS=10) (existing, future); or</del></li> <li>• <del>WHPA-C (VS=8) (existing, future); or</del></li> <li>• <del>WHPA-E (VS ≥ 9) (hazardous/liquid industrial waste) (existing, future); or</del></li> <li>• <del>WHPA-E (VS=10) (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) (existing, future).</del></li> </ul>	See Maps 1.1 – 1.21	Existing: 3 years (T-1)	GEN-5  See Explanatory Notes	MON-4

COMMENTS POLICY WST-1		
	Comments	Response
MOECC	4. WST-1 manages hazardous/liquid industrial waste through PIs and WST-4 prohibits these threats using a PI in the same areas. Please clarify which approach has been selected to address these threats. Based on our previous teleconference on July 11, 2014, we understood CTC’s preferred approach to prohibit using a PI since that would capture landfills/transfer stations, and manage those wastes that don’t require a PI through s.58.	Staff support the MOECC comment and suggest removal of WST-1.
Wellington County municipalities	8. WST-1, 2, 4 and 5 and Table 10-2 – Applicability of sub threats hazardous and liquid industrial waste and p,q,r,s,t,u wastes. In the referenced policies and table in the Amended Proposed Plan, it is noted that the hazardous and liquid industrial waste and p,q,r,s,t,u waste sub threats can be significant in vulnerability scores of 8 and 10. The Table of Drinking Water Threats, however, indicates that these sub threats can only be significant within vulnerability scores of 10 (circumstance reference numbers 1884 to 1943) and moderate within vulnerability scores of 8. This should be clarified.	WST-1 to be removed.

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
WST-2 SPC to discuss	Storage of Hazardous or Liquid Industrial Waste at Disposal Sites	RMO  Planning Approval Authority	H  A	<p><b>Part IV, s.58</b></p> <p>The storage of hazardous or liquid industrial waste or 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, that do not require an approval under the <i>Environmental Protection Act</i> are designated for the purpose of s.58 under the <i>Clean Water Act</i>, requiring risk management plans, where the threat is, or would be, significant in any of the following areas:</p> <ul style="list-style-type: none"> <li>• WHPA-A (existing, future); or</li> <li>• WHPA-B (VS=10) (existing, future); or</li> <li>• <del>WHPA-C (VS=8) (existing, future); or</del></li> <li>• <del>WHPA-E (VS ≥ 9) (hazardous/liquid industrial waste) (existing, future); or</del></li> <li>• <del>WHPA-E (VS=10) (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) (existing, future).</del></li> </ul> <p><b>Land Use Planning</b></p> <p>Waste disposal sites shall be prohibited where the activity would be a significant drinking water threat, where waste disposal sites include:</p> <p>a) <del>Storage of hazardous or liquid industrial waste at disposal sites in any of the following areas:</del></p> <ul style="list-style-type: none"> <li>• <del>WHPA-A (future); or</del></li> <li>• <del>WHPA-B (VS ≥ 8) (future); or</del></li> <li>• <del>WHPA-C (VS=8) (future); or</del></li> <li>• <del>WHPA-E (VS ≥ 9) (future).</del></li> </ul> <p>b) <del>Storage of wastes described in clauses (p), (q), (r), (s), (t) or (u) of the definition of hazardous waste in any of the following areas:</del></p> <ul style="list-style-type: none"> <li>• <del>WHPA-A (future); or</del></li> <li>• <del>WHPA-B (VS ≥ 8) (future); or</del></li> <li>• <del>WHPA-C (VS=8) (future); or</del></li> <li>• <del>WHPA-E (VS=10) (future).</del></li> </ul>	See Maps 1.1 - 1.21	<p>Future: Immediately (T-7)</p> <p>Existing: 1 year/5 years (T-6)</p> <p>Future: Immediately (T-9)</p> <p>Amend OPs and ZBLs for conformity within 5 years (T-8)</p>	<p>GEN-1</p> <p><del>WST-1</del></p> <p>See Explanatory Notes</p>	<p>MON-2</p> <p>MON-1</p>
	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							

COMMENTS POLICY WST-2		
	Comments	Response
Town of Orangeville	The Town is requesting that the CTC SPC consider revising the proposed WST-2 policy from a Part IV, Section 58 policy to an Education and Outreach policy, consistent with the Proposed South Georgian Bay Lake Simcoe Source Protection Plan. Since the Environmental Protection Act (EPA) exempts these wastes from requiring an Environmental Compliance Approval (ECA), the Town believes that it will be difficult to identify all the locations where small quantities of waste included in this prescribed drinking water threat sub-category are present, and then subsequently manage them all through risk management plans. An Education and Outreach policy will ensure land owners and tenants in the identified vulnerable areas are aware of the potential risks to drinking water associated with the storage of these hazardous and liquid industrial wastes, and provide recommendations for best management practices.	SPC to review the Education and Outreach approach used by SGBLS.

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COMMENTS POLICY WST-2		
	Comments	Response
<b>Durham Region</b>	The Region opposes the changes recommended by the Province and agreed to by the CTC to make municipalities responsible for negotiating risk management plans for exempt wastes under the <i>Environmental Protection Act, 1990</i> .	There is no Prescribed Instrument available to deal with this threat which is why a Part IV tool was chosen.
<b>Halton Region and lower tier municipalities</b>	10. Policy doesn't distinguish between waste disposal sub-categories for the storage of wastes 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. With the current policy wording, WST-2 would require Risk Management Plans for existing and future significant threats in most of Georgetown's urban area for activities such as: nursing homes, dental offices, retailers, photography/photo finishing, etc. The cost associated with implementing Risk Management Plans may be an enormous undertaking which will require considerable staff resources and budget. The policy <b>WST-2</b> should specify which waste disposal sub categories it applies to, in order to exclude unintended waste disposal sub categories (which may be addressed through other tools such as education and outreach).	SPC to review the Education and Outreach approach used by SGBLS.
<b>Wellington County municipalities</b>	6. RMP approach for hazardous and liquid industrial waste and p,q,r,s,t,u wastes. This policy has been rewritten from a prohibition approach to an RMP approach. We are supportive of this change.	Support for policy noted.
<b>Wellington County municipalities</b>	8. WST-1, 2, 4 and 5 and Table 10-2 – Applicability of sub threats hazardous and liquid industrial waste and p,q,r,s,t,u wastes. In the referenced policies and table in the Amended Proposed Plan, it is noted that the hazardous and liquid industrial waste and p,q,r,s,t,u waste sub threats can be significant in vulnerability scores of 8 and 10. The Table of Drinking Water Threats, however, indicates that these sub threats can only be significant within vulnerability scores of 10 (circumstance reference numbers 1884 to 1943) and moderate within vulnerability scores of 8. This should be clarified.	Comment noted; vulnerability scores have been revised for accuracy.

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
<b>WST-3</b> <b>No change</b>	Application of Untreated Septage to Land	MOECC	C	<b>Prescribed Instrument</b>  1) The application of untreated septage to land shall be prohibited where the activity would be a significant drinking water threat in the following areas: <ul style="list-style-type: none"> <li>• WHPA-A (<b>existing</b>, future); or</li> <li>• WHPA-B (VS=10) (future); or</li> <li>• WHPA-E (VS ≥ 8) (future); or</li> <li>• the remainder of an Issue Contributing Area for Nitrates or Pathogens (future).</li> </ul>	See Maps 1.1 - 1.21	Future: Immediately (T-3)	N/A	MON-4
				2) The application of untreated septage to land ( <del>existing</del> ) may continue only until the expiry of the current approval, after which time it shall be considered a future activity <b>in any of the following areas:</b> <ul style="list-style-type: none"> <li>• WHPA-B (VS=10) (<b>existing</b>); or</li> <li>• WHPA-E (VS ≥ 8) (<b>existing</b>); or</li> <li>• the remainder of an Issue Contributing Area for Nitrates or Pathogens (<b>existing</b>).</li> </ul>		Existing: Upon expiry or within 5 years (T-2)	N/A	

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Polices	Monitoring Policy
WST-4 Edited (no change to intent)	<ul style="list-style-type: none"> <li>▪ Storage, Treatment, and Discharge of Tailings from Mines</li> <li>▪ Landfarming of Petroleum Refining Waste</li> <li>▪ Landfilling (Hazardous Waste)</li> <li>▪ Landfilling (Municipal Waste)</li> <li>▪ Landfilling (Solid Non Hazardous Industrial or Commercial</li> <li>▪ Liquid Industrial Waste Injection into a Well</li> <li>▪ 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</li> </ul>	MOECC	C	<p><b>Prescribed Instrument</b></p> <p>1) Waste disposal sites shall be prohibited where the storage, generation or management of waste would be a significant drinking water threat, where these activities include:</p> <p>a) Storage, treatment, and discharge of tailings from mines;</p> <p>b) landfarming of petroleum refining waste;</p> <p>c) landfilling (hazardous waste); <b>in any of the following areas:</b></p> <ul style="list-style-type: none"> <li>• <del>WHPA A (future); or</del></li> <li>• <del>WHPA B (VS=10)(future); or</del></li> <li>• <del>WHPA E (VS ≥ 9) (future).</del></li> </ul> <p>d) Landfilling (municipal waste); <del>and</del></p> <p>e) landfilling (solid non-hazardous industrial or commercial);</p> <p>f) <del>the storage of hazardous or liquid industrial waste</del> <b>(large facilities such as landfills and transfer stations);</b> <del>in any of the following areas:</del></p> <ul style="list-style-type: none"> <li>• <del>WHPA A (future); or</del></li> <li>• <del>WHPA B (VS ≥ 8) (future); or</del></li> <li>• <del>WHPA C (VS=8) (future); or</del></li> <li>• <del>WHPA E (VS ≥ 9) (future).</del></li> </ul> <p>g) Liquid industrial waste injection into a well; <b>in any of the following areas:</b></p> <ul style="list-style-type: none"> <li>• <del>WHPA A (future), or</del></li> <li>• <del>WHPA B (VS ≥ 8) (future); or</del></li> <li>• <del>WHPA C (VS=8) (future).</del></li> </ul> <p>h) <del>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</del> <b>(large facilities such as landfills and transfer stations)</b> <del>in any of the following areas:</del></p> <ul style="list-style-type: none"> <li>• <del>WHPA A (future); or</del></li> <li>• <del>WHPA B (VS=10 ≥ 8) (future); or</del></li> <li>• <del>WHPA C (VS=8) (future); or</del></li> <li>• <del>WHPA E (VS=10) (future).</del></li> </ul>	See Maps 1.1 - 1.21	Future: Immediately (T-3)	WST-5	MON-4

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Polices	Monitoring Policy
	<p>waste (large facilities such as landfills and transfer stations)</p> <ul style="list-style-type: none"> <li>▪ Storage of Hazardous or Liquid Industrial Waste (large facilities such as landfills and transfer stations)</li> </ul>			<p>2) Where a waste disposal site is in an area where the storage, generation or management of waste is a significant drinking water threat, the Environmental Compliance Approval that governs the activity shall be reviewed to ensure appropriate terms and conditions are included so that the activity ceases to be a significant drinking water threat, where waste disposal sites include:</p> <p>a) Storage, treatment, and discharge of tailings from mines;</p> <p>b) Landfarming of petroleum refining waste;</p> <p>c) Landfilling (hazardous waste); <b>in any of the following areas:</b></p> <ul style="list-style-type: none"> <li>• <del>WHPA A (existing); or</del></li> <li>• <del>WHPA B (VS=10) (existing); or</del></li> <li>• <del>WHPA E (VS ≥ 9) (existing).</del></li> </ul> <p>d) Landfilling (municipal waste);</p> <p>e) Landfilling (solid non-hazardous industrial or commercial);</p> <p>f) <b>The storage of hazardous or liquid industrial waste (large facilities such as landfills and transfer stations); in any of the following areas:</b></p> <ul style="list-style-type: none"> <li>• <del>WHPA A (existing); or</del></li> <li>• <del>WHPA B (VS ≥ 8), (existing); or</del></li> <li>• <del>WHPA C (VS=8) (existing); or</del></li> <li>• <del>WHPA E (VS ≥ 9) (existing).</del></li> </ul> <p>g) Liquid industrial waste injection into a well; <b>in any of the following areas:</b></p> <ul style="list-style-type: none"> <li>• <del>WHPA A (existing); or</del></li> <li>• <del>WHPA B (VS ≥ 8) (existing); or</del></li> <li>• <del>WHPA C (VS=8) (existing).</del></li> </ul> <p>h) 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. <b>(large facilities such as landfills and transfer stations) in any of the following areas:</b></p> <ul style="list-style-type: none"> <li>• <del>WHPA A (existing); or</del></li> <li>• <del>WHPA B (VS ≥ 8) (existing); or</del></li> <li>• <del>WHPA C (VS=8) (existing); or</del></li> <li>• <del>WHPA E (VS=10) (existing).</del></li> </ul>		<p>Existing: 3 years (T-1)</p>	<p>GEN-5</p>	<p>MON-4</p>

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COMMENTS POLICY WST-4		
	Comments	Response
MOECC	4. WST-1 manages hazardous/liquid industrial waste through PIs and WST-4 prohibits these threats using a PI in the same areas. Please clarify which approach has been selected to address these threats. Based on our previous teleconference on July 11, 2014, we understood CTC's preferred approach to prohibit using a PI since that would capture landfills/transfer stations, and manage those wastes that don't require a PI through s.58	Staff support the MOECC comment and suggest removal of WST-1 and the addition of wording to indicate this policy applies to large facilities.
Wellington County municipalities	Following the changes to WST-2, p,q,r,s,t,u wastes (future) have been added to the list of prohibited activities or land uses in WST-4 section 1) – PIs and WST-5 – LUP. This seems to conflict with WST-1 and WST-2 where future activities for this sub threat are allowed and governed by PIs or RMPs. It is noted that hazardous and liquid industrial waste has also been added to WST-4 and WST-5, however, our interpretation is that future activities for this sub threats are only prohibited when present along with future landfilling operations. Therefore, other future activities for the hazardous and liquid industrial waste sub threat are covered by WST-1 (PIs) and WST-2 (RMPs). If this is not the correct interpretation, then our concern also applies to the hazardous and liquid industrial waste sub threat in WST-4 sub section 1) and WST-5.	<ul style="list-style-type: none"> <li>- WST-1 to be removed.</li> <li>- WST-2 manages the small activities.</li> <li>- WST-4 and WST-5 have been clarified to indicate they apply to large facilities.</li> </ul>
Wellington County municipalities	8. WST-1, 2, 4 and 5 and Table 10-2 – Applicability of sub threats hazardous and liquid industrial waste and p,q,r,s,t,u wastes. In the referenced policies and table in the Amended Proposed Plan, it is noted that the hazardous and liquid industrial waste and p,q,r,s,t,u waste sub threats can be significant in vulnerability scores of 8 and 10. The Table of Drinking Water Threats, however, indicates that these sub threats can only be significant within vulnerability scores of 10 (circumstance reference numbers 1884 to 1943) and moderate within vulnerability scores of 8. This should be clarified.	Comment noted; staff have removed the vulnerability scores from this policy due to the complexity of capturing the large number of circumstances associated with this policy.

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
WST-5 Edited (no change to intent)	<ul style="list-style-type: none"> <li>▪ Storage, Treatment, and Discharge of Tailings from Mines</li> <li>▪ Landfarming of Petroleum Refining Waste</li> <li>▪ Landfilling (Hazardous Waste)</li> <li>▪ Landfilling (Municipal Waste)</li> <li>▪ Landfilling (Solid Non Hazardous Industrial or Commercial)</li> <li>▪ Liquid Industrial Waste Injection into a Well</li> <li>▪ 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 (large facilities such as landfills and transfer stations)</li> <li>▪ Storage of Hazardous or Liquid Industrial Waste (large facilities such as landfills and transfer stations)</li> </ul>	Planning Approval Authority	A	<p><b>Land Use Planning</b></p> <p>The use of land for waste disposal sites shall be prohibited where the storage or generation of waste would be a significant drinking water threat, where these activities include at the following types of waste disposal sites:</p> <ul style="list-style-type: none"> <li>a) Storage, treatment, and discharge of tailings from mines;</li> <li>b) Landfarming of petroleum refining waste;</li> <li>c) Landfilling (hazardous waste); in any of the following areas:                             <ul style="list-style-type: none"> <li>• WHPA A (future); or</li> <li>• WHPA B (VS=10) (future); or</li> <li>• WHPA E (VS ≥ 9) (future).</li> </ul> </li> <li>d) Landfilling (municipal waste);</li> <li>e) Landfilling (solid non-hazardous industrial or commercial);</li> <li>f) The storage of hazardous or liquid industrial waste (large facilities such as landfills and transfer stations); in any of the following areas:                             <ul style="list-style-type: none"> <li>• WHPA A (future); or</li> <li>• WHPA B (VS ≥ 8) (future); or</li> <li>• WHPA C (VS=8) (future); or</li> <li>• WHPA E (VS ≥ 9) (future).</li> </ul> </li> <li>g) Liquid industrial waste injection into a well; in any of the following areas:                             <ul style="list-style-type: none"> <li>• WHPA A (future); or</li> <li>• WHPA B (VS ≥ 8) (future); or</li> <li>• WHPA C (VS=8) (future).</li> </ul> </li> <li>h) 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. (large facilities such as landfills and transfer stations) in any of the following areas:                             <ul style="list-style-type: none"> <li>• WHPA A (future); or</li> <li>• WHPA B (VS ≥ 8) (future); or</li> <li>• WHPA C (VS=8) (future); or</li> <li>• WHPA E (VS=10) (future).</li> </ul> </li> </ul>	See Maps 1.1 - 1.21	<p>Future: Immediately (T-9)</p> <p>Amend OPs and ZBLs for conformity within 5 years and ZBLs within 3 years of OP approval (T-8)</p>	WST-4  See Explanatory Notes	MON-1

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COMMENTS POLICY WST-5		
	Comments	Response
NEC	<p>8. New waste disposal sites are not permitted in the NEP Area and the sorts of uses related to an existing site would also not be considered a permitted use. Therefore, it is unlikely that uses related to waste disposal would receive approval from the NEC. Existing uses could be dealt with via the Niagara Escarpment Development Permit application process at such time that new development was proposed on the site.</p> <p>9. In addition to the above, the NEP currently contains policies related to water quality and quantity (i.e., Parts 2.6.1-2.6.9) and these policies are clear that development cannot adversely impact water quality or quantity. Part 2.6.6 of the NEP states that if the implementing authority (i.e., the NEC) believes that the proposed development has the potential to negatively impact ground or surface water, the applicant may be required to undertake a study to address potential impacts of the development.</p> <p>10. Based on preliminary discussions with Region of Peel staff, NEC staff would circulate any Niagara Escarpment Development Permit applications within identified vulnerable areas to the Source Protection Risk Management Official (RMO) for their review and recommendation as to whether the proposed works should be approved or if any conditions of approval should be imposed on the development.</p> <p>11. We note that the effect of this policy is legally binding (List A policy) and that the NEC is considered a “planning approval authority” in this policy. As noted above, the NEC is not legally bound to implement SPP policies but, as noted in Comment 6, we support source protection and intend to incorporate a general policy in the NEP related to the protection of source water that is consistent with the intent of the <i>Clean Water Act</i>. However, we question whether the NEC should be listed for List A policies.</p> <p>12. For the reasons noted above, staff does not feel it is necessary to develop a specific policy in the NEP for each SPP policy to address this matter.</p>	<p>Comment noted.</p> <p>Staff to remove NEC from the “List A” policy tables in the Appendices. Have confirmed this revision with MOECC staff.</p>
Halton Region and lower tier municipalities	<p>11. This policy regulates specific activities (mine tailings, land farming, liquid industrial waste injection into a well) rather than land uses. Land Use Planning tool (official plans and zoning by-laws) cannot prohibit discrete and ongoing activities. Guidance on use of land use planning tools is found in Conservation Ontario’s Implementation Resource Guide Module 3 dated 04/07/2013 (Land Use Planning), page 20, under ‘Activities vs. Uses’: “The Planning Act provides the legislative framework for municipalities to regulate land uses, not specific activities occurring within these uses”. The policy tool chosen (i.e. Official Plans and Zoning By Laws) cannot be used to implement the policy, because the policy addresses activities rather than land uses.</p> <p>From the MOE Bulletin on Risk Management Plans dated December 22, 2010, Part IV tools cannot be used for waste threats and sewage threats that require an instrument prescribed by the regulations, or that fall under the Building Code”; “Other available policy tools (like a certificate of approval) will need to be considered to manage these categories of prescribed threats” (page 3 of 11).</p> <p>Based on the information from the MOE bulletin and the Implementation Resource Guide Module 3, the policy WST-5 must use PI or Ontario Building Code (OBC) as the policy tools. In the case that a waste activity is not regulated by a PI nor falls under the OBC, then CWA Part IV tools must be the policy choice (giving due consideration to the comment on WST-2). Official Plan and zoning by law cannot be used to regulate specific activities.</p>	<p>Mine tailings, land farming, liquid industrial waste injection, etc. are all forms of waste disposal, therefore a policy relying on land use planning for implementation that effectively prohibits waste disposal as a broad category of land use would encompass these activities as well.</p>
Wellington County municipalities	<p>Following the changes to WST-2, p,q,r,s,t,u wastes (future) have been added to the list of prohibited activities or land uses in WST-4 section 1) – PIs and WST-5 – LUP. This seems to conflict with WST-1 and WST-2 where future activities for this sub threat are allowed and governed by PIs or RMPs. It is noted that hazardous and liquid industrial waste has also been added to WST-4 and WST-5, however, our interpretation is that future activities for this sub threats are only prohibited when present along with future landfilling operations. Therefore, other future activities for the hazardous and liquid industrial waste sub threat are covered by WST-1 (PIs) and WST-2 (RMPs). If this is not the correct interpretation, then our concern also applies to the hazardous and liquid industrial waste sub threat in WST-4 sub section 1) and WST-5.</p>	<ul style="list-style-type: none"> <li>- WST-1 to be removed.</li> <li>- WST-2 manages the small activities.</li> <li>- WST-4 and WST-5 have been clarified to indicate they apply to large facilities.</li> </ul>
Wellington County	<p>8. WST-1, 2, 4 and 5 and Table 10-2 – In the referenced policies and table in the Amended Proposed Plan, it is noted that the hazardous and liquid industrial waste and p,q,r,s,t,u waste sub threats can be significant in vulnerability scores of 8 and 10. The Table of Drinking Water Threats, however, indicates that these sub threats can only be</p>	<p>Comment noted; staff have removed the vulnerability scores from this policy</p>

COMMENTS POLICY WST-5		
	Comments	Response
<b>municipalities</b>	significant within vulnerability scores of 10 (circumstance reference numbers 1884 to 1943) and moderate within vulnerability scores of 8. This should be clarified.	due to the complexity of capturing the large number of circumstances associated with this policy.
<b>York Region</b>	Clause d) of this LUP policy prohibits storage of wastes described in p), q).....but does not refer to quantity. Given that WST-4 prohibits large quantity storage of these wastes using a PI and WST-2 requires RMP for existing and future small quantity storage of these wastes, we assume this policy is relevant only to large quantity storage. <u>Suggested revision:</u> Eliminate this policy as the PI already prohibits large quantity storage. OR if the intent is to use the planning process to reinforce the PI policy, add text to clearly indicate it is only large quantities of these wastes being prohibited.	Text has been added to clearly indicate this policy applies to large quantities of these wastes.

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Polices	Monitoring Policy
<b>WST-6</b> <b>No change</b>	PCB Waste Storage	RMO	G	<p><b>Part IV, s.57, s.58</b></p> <p>Where an approval under the Environmental Protection Act is not required, the establishment, operation or maintenance of a waste disposal site, including for the storage of PCB waste where it is, or would be, a significant drinking water threat, will require the following actions to be taken:</p> <p>1) The storage of PCB waste is designated for the purpose of s.57 under the <i>Clean Water Act</i>, and is therefore prohibited where the threat would be significant in any of the following areas:</p> <ul style="list-style-type: none"> <li>• WHPA-A (future); or</li> <li>• WHPA-B (VS=10) (future); or</li> <li>• WHPA-E (VS=10) (future).</li> </ul>	See Maps 1.1 - 1.21	Future: Immediately (T-5)	GEN-1	MON-2
			H	<p>2) The storage of PCB waste is designated for the purpose of s.58 under the <i>Clean Water Act</i>, requiring risk management plans, where the threat is significant in any of the following areas:</p> <ul style="list-style-type: none"> <li>• WHPA-A (existing); or</li> <li>• WHPA-B (VS=10) (existing); or</li> <li>• WHPA-E (VS=10) (existing).</li> </ul>		Existing: 1 year/5 years (T-6)	N/A	MON-2

COMMENTS POLICY WST-6		
	Comments	Response
<b>Town of Orangeville</b>	The Town's interpretation of O. Reg. 362 made under the EPA is that PCB waste and PCB related waste shall only be disposed of or stored at PCB waste storage and disposal sites that have an existing ECA, or in accordance with written instructions from the Director. Based on this understanding, the only situations where the proposed WST-6 policy would apply is when written instructions from the Director for a PCB waste storage site exist. The Town is requesting that the CTC SPC provide additional guidance on what the Risk Management Official should include in the risk management plans for PCB waste storage sites beyond the Director's requirements.	-CTC staff are not familiar with the Director's requirements and have asked MOECC staff for details. -CTC staff are not aware that there are any instances of such threats where this policy would apply, but are required to have a policy for all 21 threats.

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Polices	Monitoring Policy
<b>WST-7</b> No change	PCB Waste Storage (temporary waste destruction units)	MOECC	C	<p><b>Prescribed Instrument</b></p> <p>Where a temporary waste destruction unit for PCBs is required in an area where the storage of PCB waste is a significant drinking water threat, the Environmental Compliance Approval that governs the activity shall be reviewed or established to ensure appropriate terms and conditions are included so that the activity ceases to be, or does not become, a significant drinking water threat in any of the following areas:</p> <ul style="list-style-type: none"> <li>• WHPA-A (existing, future); or</li> <li>• WHPA-B (VS=10) (existing, future); or</li> <li>• WHPA-E (VS=10) (existing, future).</li> </ul>	See Maps 1.1 - 1.21	<p>Future: Immediately (T-3)</p> <p>Existing: 3 years (T-1)</p>	GEN-1	MON-4
<b>SWG-1</b> No change	Septic Systems Governed under the <i>Building Code Act</i>	Municipality	E	<p><b>Specify Action</b></p> <p>A prioritized maintenance inspection program for septic systems governed under the <i>Building Code Act</i>, in locations where the threat is, or would be, significant, shall be implemented by the municipality or Principal Authority under the Ontario Building Code no later than January 2017. Inspection efforts should be prioritized based on systems that pose the greatest risk to sources of drinking water, such as the oldest systems or those in any of the areas of highest vulnerability:</p> <ul style="list-style-type: none"> <li>• WHPA-A (existing, future); or</li> <li>• WHPA-B (VS=10) (existing, future); or</li> <li>• WHPA-E (VS=10) (existing, future); or</li> <li>• the remainder of an Issue Contributing Area for Nitrates or Pathogens (existing, future).</li> </ul>	See Maps 1.1 - 1.21	January 2017 (T-13)	N/A  See Explanatory Notes	MON-1
<b>SWG-2</b> Edited (no change to intent)	Septic Systems Governed under the <i>Building Code Act</i>	MOECC Municipality	K E	<p><b>Education and Outreach</b></p> <p>The Ministry of Environment and Climate Change should develop and produce education and outreach materials which shall be delivered for delivery by local municipalities to landowners with septic systems governed under the <i>Building Code Act</i> within significant threat areas that explains the rationale for the maintenance inspection program and the benefits of regular maintenance and properly functioning septic systems where the threat is, or would be, significant in any of the following areas:</p> <ul style="list-style-type: none"> <li>• WHPA-A (existing, future); or</li> <li>• WHPA-B (VS=10) (existing, future); or</li> <li>• WHPA-E (VS=10) (existing, future); or</li> <li>• the remainder of an Issue Contributing Area for Nitrates or Pathogens (existing, future).</li> </ul>	See Maps 1.1 - 1.21	Existing & Future: 2 years (T-10)	GEN-6  See Explanatory Notes	MON-4

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
<b>SWG-3 Option 1</b>  <b>No change</b>	Septic Systems Governed under the <i>Building Code Act</i>	Municipality	E	<p><b>Specify Action</b></p> <p>Where septic systems governed under the <i>Building Code Act</i> (vacant existing lot of record) would be a significant drinking water threat, septic systems shall only be permitted if the municipality is satisfied that the activity does not become a significant drinking water threat. The hydrogeological assessment to determine appropriate development density shall be conducted by a professional licensed to carry out that work for existing lots of record in any of the following areas:</p> <ul style="list-style-type: none"> <li>• WHPA-A (future); or</li> <li>• WHPA-B (VS=10) (future); or</li> <li>• WHPA-E (VS=10) (future); or</li> <li>• the remainder of an Issue Contributing Area for Nitrates or Pathogens (future).</li> </ul>	See Maps 1.1 - 1.21	Future: Immediately (T-18) <del>(T-17)</del>	N/A  See Explanatory Notes	MON-1
<b>SWG-3 Option 2</b>	Septic Systems Governed under the <i>Building Code Act</i>	Planning Approval Authority  Municipality	A  E	<p><b>Land Use Planning</b></p> <p>Where septic systems governed under the <i>Building Code Act</i> (vacant existing lot of record) would be a significant drinking water threat, <b>vacant lots of record shall be subject to site plan control so that the location of the individual on-site sewage systems and replacement beds are sited to ensure they do not become a significant drinking water threat</b> in any of the following areas:</p> <ul style="list-style-type: none"> <li>• WHPA-A (future); or</li> <li>• WHPA-B (VS=10) (future); or</li> <li>• WHPA-E (VS=10) (future); or</li> <li>• the remainder of an Issue Contributing Area for Nitrates or Pathogens (future).</li> </ul>	See Maps 1.1 - 1.21	Future: Immediately (T-9)  Amend OPs for conformity within 5 years and ZBLs within 3 years of OP approval (T-8)	N/A	MON-1

COMMENTS POLICY SWG-3		
	Comments	Response
<b>Town of Orangeville</b>	The Town is requesting that the SPC provide clarification on how a new septic system installed within any of the vulnerable areas identified in the proposed SWG-3 policy will "not become a significant drinking water threat." While the Town agrees that management and inspection measures can be implemented, it is not clear what the Municipality should require in the hydrogeological assessment report that would result in a septic system not being identified as a significant drinking water threat through the risk assessment process.	Staff propose Option 2 for SPC review with the removal of hydrological assessments.
<b>Halton Region and lower tier municipalities</b>	12. A hydrogeological assessment is not necessary for the development of an existing lot of record (residential or agricultural use). There is also no way to require the submission of the study as part of a building permit. The OBC and the Building Permit process already adequately set requirements for septic system adequacy, design and construction. Second sentence should be removed ("The hydrogeological assessment to determine appropriate development density shall be conducted by a professional licensed to carry out that work for existing lots of record in any of the following areas:"). Town of Halton Hills Staff are also concerned that an existing lot could be left undevelopable.	Staff propose Option 2 for SPC review with the removal of hydrological assessments.

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
SWG-4 No change	Septic Systems Governed under the <i>Building Code Act</i>	Planning Approval Authority	A	<b>Land Use Planning</b> 1) No new lots requiring septic systems governed under the <i>Building Code Act</i> shall be created where the activity would be a significant drinking water threat in the following area: <ul style="list-style-type: none"> <li>• WHPA-A (future).</li> </ul>	See Maps 1.1 - 1.21	Future: Immediately (T-9)	N/A  See Explanatory Notes	MON-1
				2) New lots requiring septic systems governed under the <i>Building Code Act</i> in an area where the activity would be a significant drinking water threat shall only be permitted if the municipality is satisfied that the activity will not become a significant drinking water threat. The hydrogeological assessment to determine appropriate development density shall be conducted by a professional licensed to carry out that work in any of the following areas: <ul style="list-style-type: none"> <li>• WHPA-B (VS=10) (future); or</li> <li>• WHPA-E (VS=10) (future); or</li> <li>• the remainder of an Issue Contributing Area for Nitrates, <del>or</del> Pathogens, Sodium or Chloride (future).</li> </ul>		Amend OPs and ZBLs for conformity within 5 years and ZBLs within 3 years of OP approval (T-8)		

COMMENTS POLICY SWG-4	
	Response
<p><b>Comments</b></p> <p>(SWG-4, SWG-9, SWG-14, SWG-16 and SWG-18)</p> <p>13. It is unlikely that stormwater detention ponds, sanitary sewers, storage of sewage and the use of land for sewage works would be considered a permitted use in the NEP Area outside of existing urban areas, as they are usually associated with urban development. Therefore, it is unlikely that proposals for these sorts of uses would receive approval from the NEC. Septic systems and existing uses could be dealt with via the Niagara Escarpment Development Permit application process; at such time that new development was proposed on the site. As noted above, NEC staff would circulate any Niagara Escarpment Development Permit applications within identified vulnerable areas to the Source Protection RMO for their review and recommendation. The NEP currently contains development criteria related to water quality and quantity which the proposed development would already need to meet.</p> <p>11. We note that the effect of this policy is legally binding (List A policy) and that the NEC is considered a “planning approval authority” in this policy. As noted above, the NEC is not legally bound to implement SPP policies but, as noted in Comment 6, we support source protection and intend to incorporate a general policy in the NEP related to the protection of source water that is consistent with the intent of the <i>Clean Water Act</i>. However, we question whether the NEC should be listed for List A policies.</p> <p>12. For the reasons noted above, staff does not feel it is necessary to develop a specific policy in the NEP for each SPP policy to address this matter.</p>	<p><b>Response</b></p> <p>Comment noted.</p> <p>Staff to remove NEC from the “List A” policy tables in the Appendices. Have confirmed this revision with MOECC staff.</p>

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
SWG-5 No change	Septic Systems Governed under the <i>Building Code Act</i>	MMAH	K	<p><b>Specify Action</b></p> <p>The Ministry of Municipal Affairs and Housing is requested to amend the <i>Building Code Act</i> to permit municipalities to require higher standards for septic systems governed under the <i>Building Code Act</i> to deal with nitrate and pathogen threats where they would be a significant drinking water threat in any of the following areas:</p> <ul style="list-style-type: none"> <li>• WHPA-A (future); or</li> <li>• WHPA-B (VS=10) (future); or</li> <li>• WHPA-E (VS=10) (future); or</li> <li>• the remainder of an Issue Contributing Area for Nitrates or Pathogens (future).</li> </ul>	See Maps 1.1 - 1.21	Future: Immediately (T-18) <del>(T-17)</del>	N/A  See Explanatory Notes	MON-4

COMMENTS POLICY SWG-5		
	Comments	Response
Halton Region and lower tier municipalities	13. Requirement wording and objective of policy is not clear – “to permit municipalities to require”. If intent is to require upgraded systems in specific areas to deal with nitrate issues, then the policy should be reworded to state this.	The intent of this policy is directed towards MMAH to provide the tools through the <i>Building Code Act</i> so that in the future a policy could allow municipalities to require a higher standard for septic.

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
SWG-6 Edited (no change to intent)	Septic Systems Governed under the <i>Building Code Act</i> and <i>Ontario Water Resources Act</i>	Municipality	E	<p><b>Specify Action</b></p> <p>Where municipal sanitary sewers and capacity are available, the municipality is encouraged to pass by-laws <b>under the <i>Municipal Act</i></b> to require mandatory connections to the municipal sewer system for new development and existing septic systems governed under the <i>Building Code Act</i> and the <i>Ontario Water Resources Act</i>, and the decommissioning of existing systems, where they are a significant drinking water threat located in any of the following areas:</p> <ul style="list-style-type: none"> <li>• WHPA-A (existing); or</li> <li>• WHPA-B (VS=10) (existing); or</li> <li>• WHPA-E (VS=10) (existing); or</li> <li>• the remainder of an Issue Contributing Area for Nitrates, <del>or</del> Pathogens, Sodium or Chloride (existing).</li> </ul>	See Maps 1.1 - 1.21	Existing: Consider within 2 years (T-15)	N/A  See Explanatory Notes	MON-1

COMMENTS POLICY SWG-6		
	Comments	Response
MMAH	<p>Policy SWG-6 encourages municipalities to pass by-laws to require mandatory connections to the municipal sewer system for new development and existing septic systems governed under the <i>Building Code Act</i> and the <i>Ontario Water Resources Act</i>, and the decommissioning of existing systems, where they would be a significant drinking water threat. The ministry has identified that the <i>Building Code Act</i> does not provide the authority to require landowners to decommission existing systems and connect to municipal systems. Therefore, the policy is above and beyond the requirements under the <i>Building Code Act</i> and may be difficult to implement.</p> <p>While we support the concept of encouraging connections to municipal sewage systems, the municipal servicing is the preferred form of servicing for settlement areas in accordance with the 2014 PPS, we recommend that the policy be revised to include encouragement policies in the municipal OPs and that municipalities also consider programs, plans and incentives to ensure the long-term goal of connection to the preferred servicing form.</p>	Clarification has been provided in the policy to indicate the by-laws are to be passed under the <i>Municipal Act</i> and not the <i>Building Code Act</i> . CTC staff discussed this policy with MMAH and they had no comment on the policy once this was clarified.
Town of Orangeville	The Town is requesting that the CTC SPC clarify if the Municipality is being "encouraged" to pass a by-law requiring mandatory connections to municipal sanitary sewers where available in the specified vulnerable areas, or if this is a policy the Municipality must comply with (Legal Effect E).	Municipalities must comply with the policy by considering it and deciding to implement or not implement. The policy is written in such a way so as to allow the municipality to make a local decision as to if the policy will or won't work for their local situation. Municipalities will be required to provide rationale if they choose not to implement the policy.
York Region	<p>This policy seems to conflict with SWG-4 (part 2). If septic systems in WHPA-B, WHPA-E and ICAs should be decommissioned, why are they permitted in future in SWG-4 (part 2)?</p> <p><u>Suggested revision:</u> Revise SWG-6 to be consistent with SWG-4 (SWG-6 should only apply in WHPA-A)</p>	SWG-4(2) provides municipalities the option of approving or not approving new septic systems in the future while SWG-6 deals with existing systems. The ideal solution would be to decommission and connect to sewers but realize that may not be a practical situation in every municipality and the policies allow for local decision making.

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
SWG-7 No change	Septic Systems Governed under the <i>Building Code Act</i> and <i>Ontario Water Resources Act</i>	Municipality SPA	E	<p><b>Specify Action</b></p> <p>The municipality in cooperation with local health units and Source Protection Authorities shall provide education and outreach materials for septic systems governed under the <i>Building Code Act</i> and the <i>Ontario Water Resources Act</i> to landowners in the entire Issue Contributing Area for Sodium or Chloride regarding:</p> <p>a) the use of more efficient water softeners to reduce the discharge of salt to the septic system; and                      b) promoting best management practices to ensure outdoor taps are not connected to the softened water line.</p>	See Maps 1.2 1.3 1.11 1.14	Existing: 2 years (T-10)	GEN-6  See Explanatory Notes	MON-1 MON-3

COMMENTS POLICY SWG-7	
Comments	Response
<p><b>Town of Orangeville</b></p> <p>The Town is requesting that the CTC SPC provide further clarification on the requirement for the Municipality to "provide" education and outreach materials in cooperation with local health units and the Source Protection Authorities. Does this proposed policy require the Municipality to develop the education and outreach materials as well as distribute them? If so, the Town is requesting that staffing and funding limitations at smaller municipalities be considered before finalizing this policy.</p>	<p>The SPA has been named as an implementing body alongside the municipality because materials on septic systems have already been developed as part of our ODWSP that will be shared with our municipalities. Where possible, we have written the policies in such a way to try and get authorities other than the municipalities to develop the materials where possible. In addition, SPMIF funding has been provided to the Town of Orangeville by the Province that could be used towards policies such as this.</p>

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
SWG-8 No change	Septic Systems Regulated under the <i>Ontario Water Resources Act</i>	MOECC	C	<p><b>Prescribed Instrument</b></p> <p>1) Septic systems with subsurface disposal of effluent, as regulated by the <i>Ontario Water Resources Act</i>, shall be prohibited where the activity would be a significant drinking water threat in the following area:</p> <ul style="list-style-type: none"> <li>WHPA-A (future).</li> </ul> <p>2) Where septic systems with subsurface disposal of effluent, as regulated by the <i>Ontario Water Resources Act</i>, are in an area where the activity is, or would be, a significant drinking water threat, the Environmental Compliance Approval that governs the activity shall be reviewed or established to ensure appropriate terms and conditions are included so that the activity ceases to be, or does not become, a significant drinking water threat in any of the following areas:</p> <ul style="list-style-type: none"> <li>WHPA-A (existing); or</li> <li>WHPA-B (VS=10) (existing, future); or</li> <li>WHPA-E (VS=10) (existing, future); or</li> <li>the remainder of an Issue Contributing Area for Nitrates, <del>or</del> Pathogens, Sodium or Chloride (existing, future).</li> </ul>	See Maps 1.1 - 1.21	<p>Future: Immediately (T-3)</p> <p>Future: Immediately (T-3)</p> <p>Existing: 3 years (T-1)</p>	<p>SWG-9  See Explanatory Notes</p> <p>GEN-5 SWG-9  See Explanatory Notes</p>	<p>MON-4</p> <p>MON-4</p>

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
SWG-9 No change	Septic Systems Regulated under the Ontario Water Resources Act	Planning Approval Authority	A	<b>Land Use Planning</b> 1) New development dependent on septic systems with subsurface disposal of effluent, as regulated by the <i>Ontario Water Resources Act</i> , shall be prohibited where the activity would be a significant drinking water threat in the following area: <ul style="list-style-type: none"> <li>• WHPA-A (future).</li> </ul>	See Maps 1.1 - 1.21	Future: Immediately (T-9)	SWG-8  See Explanatory Notes	MON-1
				2) New development dependent on septic systems with subsurface disposal of effluent, as regulated by the <i>Ontario Water Resources Act</i> , in an area where the activity would be a significant drinking water threat, shall only be permitted where it has been demonstrated by the proponent through an approved Environmental Assessment or similar planning process that the location for the septic system is the preferred alternative and the safety of the drinking water system has been assured in any of the following areas: <ul style="list-style-type: none"> <li>• WHPA-B (VS=10) (future); or</li> <li>• WHPA-E (VS=10) (future); or</li> <li>• the remainder of an Issue Contributing Area for Nitrates, <del>or</del> Pathogens, Sodium or Chloride (future).</li> </ul>		Amend OPs and ZBLs for conformity within 5 years and ZBLs within 3 years of OP approval (T-8)		

COMMENTS POLICY SWG-9		
	Comments	Response
NEC	<p>13. It is unlikely that stormwater detention ponds, sanitary sewers, storage of sewage and the use of land for sewage works would be considered a permitted use in the NEP Area outside of existing urban areas, as they are usually associated with urban development. Therefore, it is unlikely that proposals for these sorts of uses would receive approval from the NEC. Septic systems and existing uses could be dealt with via the Niagara Escarpment Development Permit application process, at such time that new development was proposed on the site. As noted above, NEC staff would circulate any Niagara Escarpment Development Permit applications within identified vulnerable areas to the Source Protection RMO for their review and recommendation. The NEP currently contains development criteria related to water quality and quantity which the proposed development would already need to meet. (SWG-4, SWG-9, SWG-14, SWG-16 and SWG-18)</p> <p>11. We note that the effect of this policy is legally binding (List A policy) and that the NEC is considered a “planning approval authority” in this policy. As noted above, the NEC is not legally bound to implement SPP policies but, as noted in Comment 6, we support source protection and intend to incorporate a general policy in the NEP related to the protection of source water that is consistent with the intent of the <i>Clean Water Act</i>. However, we question whether the NEC should be listed for List A policies.</p> <p>12. For the reasons noted above, staff does not feel it is necessary to develop a specific policy in the NEP for each SPP policy to address this matter.</p>	<p>Comment noted.</p> <p>Staff to remove NEC from the “List A” policy tables in the Appendices. Have confirmed this revision with MOECC staff.</p>
Halton Region and lower tier munic.	<p>14. We assume the definition of “new development” is consistent with the definition of “development” in the PPS. Clarity is needed and could be provided by the MOE.</p> <p>18. “Similar planning process” is too general and should be further clarified (such as development approved through a Planning Act or Condominium Act application). Staff interprets a similar planning process to be equivalent to the planning process for developments approved under the Environmental Assessment Act. (SWG-9, SWG-12, SWG-14, SWG-16 )</p>	<p>- Yes, the definition is the same and will be noted in ED.</p> <p>- “Similar planning process” has to have dealt with an assessment that the septic system is the preferred alternative and that they have taken into account the safety of the drinking water system. Staff will provide clarification in the Explanatory Document.</p>

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
SWG-10 No change	Septic Systems Regulated under the <i>Ontario Water Resources Act</i>	MOECC	K	<p><b>Specify Action</b></p> <p>The Ministry of Environment is requested to develop guidelines for managing significant drinking water threats from septic systems with subsurface disposal of effluent, as regulated by the <i>Ontario Water Resources Act</i>, for distribution to developers, municipalities and other interested or affected parties in any of the following areas:</p> <ul style="list-style-type: none"> <li>• WHPA-A (existing, future); or</li> <li>• WHPA-B (VS=10) (existing, future); or</li> <li>• WHPA-E (VS=10) (existing, future); or</li> <li>• the remainder of an Issue Contributing Area for Nitrates, Pathogens, Sodium or Chloride (existing, future).</li> </ul>	See Maps 1.1 - 1.21	Existing & Future: Consider within 2 years (T-15)	N/A  See Explanatory Notes	MON-4

COMMENTS POLICY SWG-10		
	Comments	Response
Halton Region and lower tier municipalities	15. It is unclear how this policy differs from the requirements under an Environmental Compliance Approval. Halton Region and its local municipalities are unclear what this policy is asking the MOE to do and what is expected to be accomplished by “guidelines”. Clarity is needed to explain the purpose of these proposed guidelines in the context of avoiding policy duplication with existing prescribed instruments. If the intent is education and outreach/awareness, then the policy should specify so.	Comment noted, no change recommended. Policy is not directed towards the municipalities and MOECC has not commented on this policy and have expressed no concern.

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
SWG-11 Revised for accuracy	Discharge from a Stormwater Retention Pond	MOECC	C	<p><b>Prescribed Instrument</b></p> <p>1) Discharge, including infiltration, from a stormwater retention pond shall be prohibited into an area where the discharge would be a significant drinking water threat in the following area:</p> <ul style="list-style-type: none"> <li>WHPA-A (future).</li> </ul>	See Maps 1.1 - 1.21	Future: Immediately (T-3)	SWG-12 See Explanatory Notes	MON-4
				<p>2) Where the discharge from a stormwater retention pond is in an area where the activity is, or would be, a significant drinking water threat, the Environmental Compliance Approval that governs the activity shall be reviewed or established to ensure appropriate terms and conditions are included so that the activity ceases to be, or does not become, a significant drinking water threat in the following areas:</p> <ul style="list-style-type: none"> <li>WHPA-A (existing); or</li> <li>WHPA-B (VS=10) (existing, future); or</li> <li>WHPA-E (VS ≥ 8) (existing, future); or</li> <li>the remainder of an Issue Contributing Area for Nitrates, Pathogens, Sodium or Chloride (existing, future).</li> </ul> <p>Not limiting any other conditions to be included in the Environmental Compliance Approval, the Issuing Director should include the following conditions, where possible:</p> <ul style="list-style-type: none"> <li>no untreated stormwater is discharged from the pond into a WHPA-E where it would be classified as a significant drinking water threat;</li> <li>existing infiltration ponds are lined to prevent infiltration of contaminants; and</li> <li>in an Issue Contributing Area for Sodium or Chloride, require actions to reduce sodium and chloride loading into the pond from upstream lands where the application of road salt occurs.</li> </ul>		Future: Immediately (T-3)  Existing: 3 years (T-1)	GEN-5 SWG-12  See Explanatory Notes	MON-4

COMMENTS POLICY SWG-11		
	Comments	Response
Town of Orangeville	The Table of Drinking Water Threats does not identify discharge from a stormwater retention pond as a potential drinking water threat for Sodium, therefore there is no requirement for the CTC SPC to develop a policy for stormwater management ponds in relation to Sodium. The Town is requesting that the SPC modify these policies to remove reference to ICAs for Sodium in SWG-11 and SWG-12.	Change made; sodium removed from policy.
Halton Region and lower tier munic.	<p>16. As per Table 20, in the Table of Circumstances, the threat definition pertains to untreated stormwater from a stormwater retention pond. "Untreated" is a qualifier that may limit the number of systems affected (based on the MOE's Table of Circumstances). Removal of the term "untreated" may expand the policy scope beyond the original intent and affect a much greater number of SWM ponds in the Town of Halton Hills (approximately 11 other existing ponds). Add the term 'untreated' in the first paragraph of the policy.</p> <p>The actions in the last bullet in SWG-11 are duplicated (see SAL-1 through SAL-7) and do not need to be included in SWG-11.</p> <p>The policy lists conditions "where possible", which should be replaced with "where feasible and reasonable". Town of Halton Hills is concerned with the potential costs associated with retrofitting existing facilities (typically around \$2 million/pond for complete</p>	<p>-The Table of Circumstances does not describe this threat as "untreated". There is no treatment that will remove Chloride from the SWM pond. The error has been corrected in part 2 where the term untreated was mentioned.</p> <p>-Staff do not consider this duplication as the policies are intended to work together.</p> <p>-The policy is directed towards MOECC who will have to make determinations of what is feasible. "Where possible" includes feasibility,</p>

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rehabilitation and remediation). Municipalities simply do not have the resources to reconstruct these facilities. Consideration should be given by the CTC SPC and the MOE when proposing pond retrofits. Funding support from the Province will be required.	cost, etc. Staff will provide further clarification in the Explanatory Document.
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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
SWG-12 <b>Revised for accuracy</b>	Discharge from a Stormwater Retention Pond	Planning Approval Authority	A	<b>Land Use Planning</b> 1) The use of land for the establishment of new stormwater retention ponds shall be prohibited where the discharge (including infiltration) of stormwater would be into a significant threat area in the following area: <ul style="list-style-type: none"> <li>• WHPA-A (future).</li> </ul>	See Maps 1.1 - 1.21	Future: Immediately (T-9)	SWG-11  <b>See Explanatory Notes</b>	MON-1
				2) The use of land for the discharge from a stormwater retention pond in an area where the activity would be a significant drinking water threat, shall only be permitted where it has been demonstrated by the proponent through an approved Environmental Assessment or similar planning process that the location of discharge from a stormwater retention pond is the preferred alternative and the safety of the drinking water system has been assured in any of the following areas: <ul style="list-style-type: none"> <li>• WHPA-B (VS=10) (future); or</li> <li>• WHPA-E (VS ≥ 8) (future); or</li> <li>• the remainder of an Issue Contributing Area for Nitrates, Pathogens, <b>Sodium</b> or Chloride (future).</li> </ul>		Amend OPs and ZBLs for conformity within 5 years and ZBLs within 3 years of OP approval (T-8)		

COMMENTS POLICY SWG-12		
	Comments	Response
<b>Town of Orangeville</b>	The Table of Drinking Water Threats does not identify discharge from a stormwater retention pond as a potential drinking water threat for Sodium, therefore there is no requirement for the CTC SPC to develop a policy for stormwater management ponds in relation to Sodium. The Town is requesting that the SPC modify these policies to remove reference to ICAs for Sodium in SWG-11 and SWG-12.	Change made; sodium removed from policy.
<b>Halton Region and lower tier munic.</b>	<p>17. With respect to salt contained in the discharge from a stormwater retention pond, it is unclear what constitutes whether the “safety of the drinking water system has been assured”. If this is meant to imply a salt reduction in the pond discharge, Halton Region’s understanding is that chloride is beyond the limit of technology for stormwater pretreatment and treatment practices without the introduction of cost-prohibitive desalination or ultra-filtration technology.</p> <p>Based on the inability of stormwater management facilities to reduce road salt, this policy could be interpreted to prohibit any growth from occurring within WHPA-B, WHPA-E, chloride ICA and the nitrate ICA. This prohibition impacts over 4700 acres of rural and urban lands within Georgetown and Acton and would preclude development and intensification within large areas of planned urban areas, contrary to mandated growth under Places to Grow Act.</p> <p>The primary concern is not the pond discharge but the chloride contaminants that may enter the pond from upstream areas. Hence, policy focus should solely rely on pollution prevention through protective upstream salt management policies (such as SAL-1 to 13) and not restrict stormwater management processes which support intensification within existing urban areas (Acton, Georgetown) or new greenfield areas which have been designated in the Region’s Official Plan to accommodate future growth (i.e. Southwest Georgetown).</p>	<p>This policy does not suggest end of pipe treatment as it is not practicable. There are other options such as: locating the discharge outside of the vulnerable area, reducing the use of salt in the areas that drain into the stormwater retention pond, etc.</p> <p>We agree that if the salt management/reduction policies are implemented that municipalities will have met the test of SWG-12 to ensure the safety of the drinking water system.</p>

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 Highlighted text = revisions made after public consultation

COMMENTS POLICY SWG-12		
	Comments	Response
<b>Halton Region and lower tier munic.</b>	18. "Similar planning process" is too general and should be further clarified (such as development approved through a Planning Act or Condominium Act application). Staff interprets a similar planning process to be equivalent to the planning process for developments approved under the Environmental Assessment Act. (SWG-9, SWG-12, SWG-14, SWG-16 )	"Similar planning process" has to have dealt with an assessment that the stormwater retention pond is the preferred alternative and that they have taken into account the safety of the drinking water system. Staff will provide clarification in the Explanatory Document.

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
<b>SWG-13</b> <b>No change</b>	Sanitary Sewers and Related Pipes	MOECC	C	<p><b>Prescribed Instrument</b></p> <p>Where sanitary sewers and related pipes are in an area where the activity is, or would be, a significant drinking water threat, the Environmental Compliance Approval that governs the activity shall be reviewed or established to ensure appropriate terms and conditions so that the activity ceases to be, or does not become, a significant drinking water threat in any of the following areas:</p> <ul style="list-style-type: none"> <li>• WHPA-A (existing, future); or</li> <li>• WHPA-B (VS=10) (existing, future); or</li> <li>• WHPA-E (VS=10) (existing, future); or</li> <li>• the remainder of an Issue Contributing Area for Nitrates or Pathogens (existing, future).</li> </ul> <p>Not limiting any other conditions to be included in the Environmental Compliance Approval, the Issuing Director should include the following conditions, where possible:</p> <ul style="list-style-type: none"> <li>• requiring higher construction standards; and</li> <li>• inspections by the owner for leaks.</li> </ul>	See Maps 1.1 - 1.21	<p>Future: Immediately (T-3)</p> <p>Existing: 3 years (T-1)</p>	<p>GEN-5 SWG-14</p> <p>See Explanatory Notes</p>	MON-4

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
SWG-14 No change	Sanitary Sewers and Related Pipes	Planning Approval Authority	A	<p><b>Land Use Planning</b></p> <p>New development dependent on sanitary sewers and related pipes, in an area where the activity would be a significant drinking water threat, shall only be permitted where it has been demonstrated by the proponent through an approved Environmental Assessment or similar planning process, that the location for the sanitary sewer and related pipes is the preferred alternative and the safety of the drinking water system has been assured in any of the following areas:</p> <ul style="list-style-type: none"> <li>• WHPA-A (future); or</li> <li>• WHPA-B (VS=10) (future); or</li> <li>• WHPA-E (VS=10) (future); or</li> <li>• the remainder of an Issue Contributing Area for Nitrates or Pathogens (future).</li> </ul>	See Maps 1.1 - 1.21	<p>Future: Immediately (T-9)</p> <p>Amend OPs and ZBLs for conformity within 5 years and ZBLs within 3 years of OP approval (T-8)</p>	<p>SWG-13</p> <p>See Explanatory Notes</p>	MON-1

COMMENTS POLICY SWG-14		
	Comments	Response
NEC	<p>13. It is unlikely that stormwater detention ponds, sanitary sewers, storage of sewage and the use of land for sewage works would be considered a permitted use in the NEP Area outside of existing urban areas, as they are usually associated with urban development. Therefore, it is unlikely that proposals for these sorts of uses would receive approval from the NEC. Septic systems and existing uses could be dealt with via the Niagara Escarpment Development Permit application process, at such time that new development was proposed on the site. As noted above, NEC staff would circulate any Niagara Escarpment Development Permit applications within identified vulnerable areas to the Source Protection RMO for their review and recommendation. The NEP currently contains development criteria related to water quality and quantity which the proposed development would already need to meet. (SWG-4, SWG-9, SWG-14, SWG-16 and SWG-18)</p> <p>11. We note that the effect of this policy is legally binding (List A policy) and that the NEC is considered a “planning approval authority” in this policy. As noted above, the NEC is not legally bound to implement SPP policies but, as noted in Comment 6, we support source protection and intend to incorporate a general policy in the NEP related to the protection of source water that is consistent with the intent of the <i>Clean Water Act</i>. However, we question whether the NEC should be listed for List A policies.</p> <p>12. For the reasons noted above, staff does not feel it is necessary to develop a specific policy in the NEP for each SPP policy to address this matter.</p>	<p>Comment noted.</p> <p>Staff to remove NEC from the “List A” policy tables in the Appendices. Have confirmed this revision with MOECC staff.</p>
Halton Region and lower tier municipalities	<p>18. “Similar planning process” is too general and should be further clarified (such as development approved through a Planning Act or Condominium Act application). Staff interprets a similar planning process to be equivalent to the planning process for developments approved under the Environmental Assessment Act. (SWG-9, SWG-12, SWG-14, SWG-16 )</p>	<p>“Similar planning process” has to have dealt with an assessment that the sanitary sewer is the preferred alternative and that they have taken into account the safety of the drinking water system. Staff will provide clarification in the Explanatory Document.</p>

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Polices	Monitoring Policy
SWG-15 No change	Storage of Sewage	MOECC	C	<p><b>Prescribed Instrument</b></p> <p>1) The storage of sewage shall be prohibited where the activity would be a significant drinking water threat in any of the following areas:</p> <ul style="list-style-type: none"> <li>• WHPA-A (future); or</li> <li>• WHPA-E (VS ≥ 9) (future); or</li> <li>• WHPA-E (VS≥4.5) in an Issue Contributing Area for Nitrates or Pathogens (future).</li> </ul>	See Maps 1.1 - 1.21	Future: Immediately (T-3)	SWG-16  See Explanatory Notes	MON-4
				<p>2) Where facilities for the storage of sewage are in an area where the activity is, or would be, a significant drinking water threat, the Environmental Compliance Approval that governs the activity shall be reviewed or established to ensure appropriate terms and conditions are included so that the activity ceases to be, or does not become, a significant drinking water threat in any of the following areas:</p> <ul style="list-style-type: none"> <li>• WHPA-A (existing); or</li> <li>• WHPA-B (VS ≥ 8) (existing, future); or</li> <li>• WHPA-C (VS=8) (existing, future); or</li> <li>• WHPA-E (VS ≥ 9) (existing); or</li> <li>• WHPA-E (VS≥4.5) in an Issue Contributing Area for Nitrates or Pathogens (existing); or</li> <li>• the remainder of an Issue Contributing Area for Nitrates or Pathogens (existing, future).</li> </ul>		Future: Immediately (T-3)  Existing: 3 years (T-1)	GEN-5 SWG-16  See Explanatory Notes	MON-4

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Polices	Monitoring Policy
SWG-16 No change	Storage of Sewage	Planning Approval Authority	A	<p><b>Land Use Planning</b></p> <p>1) The use of land for the establishment of facilities for the storage of sewage shall be prohibited where the activity would be a significant drinking water threat in any of the following areas:</p> <ul style="list-style-type: none"> <li>• WHPA-A (future); or</li> <li>• WHPA-E (VS ≥ 9) (future); or</li> <li>• WHPA-E (VS≥4.5) in an Issue Contributing Area for Nitrates or Pathogens (future).</li> </ul>	See Maps 1.1 - 1.21	Future: Immediately (T-9)	SWG-15	MON-1
				<p>2) The use of land for the establishment of facilities for the storage of sewage, in an area where the activity would be a significant drinking water threat, shall only be permitted where it has been demonstrated by the proponent through an approved Environmental Assessment or similar planning process that the location for the storage of sewage is the preferred alternative and the safety of the drinking water system has been assured in any of the following areas:</p> <ul style="list-style-type: none"> <li>• WHPA-B (VS ≥ 8) (future); or</li> <li>• WHPA-C (VS=8) (future); or</li> <li>• the remainder of an Issue Contributing Area for Nitrates or Pathogens (future).</li> </ul>				

COMMENTS POLICY SWG-16		
	Comments	Response
NEC	<p>13. It is unlikely that stormwater detention ponds, sanitary sewers, storage of sewage and the use of land for sewage works would be considered a permitted use in the NEP Area outside of existing urban areas, as they are usually associated with urban development. Therefore, it is unlikely that proposals for these sorts of uses would receive approval from the NEC. Septic systems and existing uses could be dealt with via the Niagara Escarpment Development Permit application process, at such time that new development was proposed on the site. As noted above, NEC staff would circulate any Niagara Escarpment Development Permit applications within identified vulnerable areas to the Source Protection RMO for their review and recommendation. The NEP currently contains development criteria related to water quality and quantity which the proposed development would already need to meet. (SWG-4, SWG-9, SWG-14, SWG-16 and SWG-18)</p> <p>11. We note that the effect of this policy is legally binding (List A policy) and that the NEC is considered a “planning approval authority” in this policy. As noted above, the NEC is not legally bound to implement SPP policies but, as noted in Comment 6, we support source protection and intend to incorporate a general policy in the NEP related to the protection of source water that is consistent with the intent of the <i>Clean Water Act</i>. However, we question whether the NEC should be listed for List A policies.</p> <p>12. For the reasons noted above, staff does not feel it is necessary to develop a specific policy in the NEP for each SPP policy to address this matter.</p>	<p>Comment noted.</p> <p>Staff to remove NEC from the “List A” policy tables in the Appendices. Have confirmed this revision with MOECC staff.</p>
Halton Region and lower tier munic.	<p>18. “Similar planning process” is too general and should be further clarified (such as development approved through a Planning Act or Condominium Act application). Staff interprets a similar planning process to be equivalent to the planning process for developments approved under the Environmental Assessment Act. (SWG-9, SWG-12, SWG-14, SWG-16 )</p>	<p>“Similar planning process” has to have dealt with an assessment that the facility for the storage of sewage is the preferred alternative and that they have taken into account the safety of the drinking water system. Staff will provide clarification in the Explanatory Document.</p>

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Polices	Monitoring Policy
SWG-17 SPC to discuss	Combined Sewer Discharge from a Stormwater Outlet to Surface Water	MOECC	C	<p><b>Prescribed Instrument</b></p> <p>1) Future sewage works shall be prohibited where the establishment, operation and maintenance of sewage works would be a significant drinking water threat, where the sewage works discharge is to surface water from:</p> <ul style="list-style-type: none"> <li>a) Combined sewer discharge from a stormwater outlet to surface water;</li> <li><del>b) Industrial effluent discharges;</del></li> <li>b) Sewage treatment bypass discharge to surface water; and</li> <li>c) Sewage treatment plant effluent discharge (includes lagoons);</li> </ul> <p>in any of the following areas:</p> <ul style="list-style-type: none"> <li>• WHPA-E (VS ≥ 8) (future); or</li> <li>• WHPA-E (VS ≥ 4.2) in an Issue Contributing Area for Nitrates or Pathogens, <del>Sodium or Chloride</del> (future); and</li> </ul> <p>where the discharge is to land, also in:</p> <ul style="list-style-type: none"> <li>• the remainder of an Issue Contributing Area for Nitrates or Pathogens, <del>Sodium or Chloride</del> (future).</li> </ul> <p><b>d) Industrial effluent discharges, in any of the following areas:</b></p> <ul style="list-style-type: none"> <li>• WHPA-E (VS ≥ 8) (future); or</li> <li>• WHPA-E (VS ≥ 4.2) in an Issue Contributing Area for Nitrates, Pathogens or Chloride (future); and</li> </ul> <p>where the discharge is to land, also in:</p> <ul style="list-style-type: none"> <li>• the remainder of an Issue Contributing Area for Nitrates, Pathogens or Chloride (future).</li> </ul>	See Maps 1.1 - 1.21	Future: Immediately (T-3)	SWG-18  See Explanatory Notes	MON-4
	Industrial Effluent Discharges			<p>2) Where existing sewage works are in an area where the activity is a significant drinking water threat, the Environmental Compliance Approval that governs the activity shall be reviewed to ensure appropriate terms and conditions are included so that the activity ceases to be a significant drinking water threat, where the sewage works discharge is to surface water from:</p> <ul style="list-style-type: none"> <li>a) Combined sewer discharge from a stormwater outlet to surface water;</li> <li><del>b) Industrial effluent discharges;</del></li> <li>b) Sewage treatment bypass discharge to surface water; and</li> <li>c) Sewage treatment plant effluent discharges (includes lagoons);</li> </ul> <p>in any of the following areas:</p> <ul style="list-style-type: none"> <li>• WHPA-E (VS ≥ 8) (existing); or</li> <li>• WHPA-E (VS ≥ 4.2) in an Issue Contributing Area for Nitrates or Pathogens, <del>Sodium or Chloride</del> (existing); and</li> </ul> <p>where the discharge is to land, also in:</p>		Existing: 3 years (T-1)	GEN-5  See Explanatory Notes	MON-4
	Sewage Treatment Bypass Discharge to Surface Water							
	Sewage Treatment Plant Effluent Discharges (Includes Lagoons)							

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Polices	Monitoring Policy
				<ul style="list-style-type: none"> <li>the remainder of an Issue Contributing Area for Nitrates or Pathogens, Sodium or Chloride (existing).</li> </ul> <p>d) Industrial effluent discharges, in any of the following areas:</p> <ul style="list-style-type: none"> <li>WHPA-E (VS ≥ 8) (existing); or</li> <li>WHPA-E (VS ≥ 4.2) in an Issue Contributing Area for Nitrates, Pathogens or Chloride (existing); and</li> </ul> <p>where the discharge is to land, also in:</p> <ul style="list-style-type: none"> <li>the remainder of an Issue Contributing Area for Nitrates, Pathogens or Chloride (existing).</li> </ul>				

COMMENTS POLICY SWG-17	
	Comments
<b>Town of Orangeville</b>	<p>While the Town acknowledges that the Town's Water Pollution Control Plant (WPCP) effluent forms a significant portion of the total Sodium and Chloride loading within the ICA for Well 10, the approved Assessment Report indicates that additional analysis is required for a link between the Sodium and Chloride in the WPCP effluent and the Sodium and Chloride in the Well 10 water supply to be established. Further, a review of the MOECC Table of Drinking Water Threats for the sub-threats identified in the proposed SWG-17 and SWG-18 policies indicates that sewage treatment plant effluent discharges are not a prescribed drinking water threat for either Sodium or Chloride. The only sub-threat considered in SWG-17 and SWG-18 that could become a significant drinking water threat for Sodium or Chloride is industrial effluent discharges to surface water in an ICA for Chloride.</p> <p>Since none of the sub-threat categories included in the proposed SWG-17 and SWG-18 policies have the potential to become a significant drinking water threat for Sodium, there is no requirement for the CTC SPC to develop a policy for these sub-threats in relation to Sodium. As such, the Town is requesting that the CTC SPC modify the proposed SWG-17 and SWG-18 policies to remove all references to ICAs for Sodium.</p> <p>Since the only sub-threat category identified in the proposed SWG-17 and SWG-18 policies that could become a significant drinking water threat in an ICA for Chloride is industrial effluent discharges to surface water, the Town is requesting that the CTC SPC revise the policies for SWG-17 and SWG-18 such that they only apply to industrial effluent discharges in an ICA for Chloride.</p>

Response
<p>Staff propose removing Sodium and Chloride for the sub-threats identified in this policy as per Town of Orangeville comments. However, Industrial Effluent Discharges can be a significant threat in an ICA for Chloride (not Sodium) and the policy has been revised to reflect this.</p>

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Polices	Monitoring Policy
SWG-18 SPC to discuss	Combined Sewer Discharge from a Stormwater Outlet to Surface Water	Planning Approval Authority	A	<p><b>Land Use Planning</b></p> <p>1) <del>The use of land for the Development dependent on the establishment of sewage works, or any use of land for any purpose that would be dependent on these sewage works,</del> shall be prohibited where <del>sewage works the activity</del> would be a significant drinking water threat where the sewage works discharge is to surface water from:</p> <p>a) Combined sewer discharge from a stormwater outlet to surface water;</p> <p><del>b) Industrial effluent discharges;</del></p> <p>b) Sewage treatment bypass discharge to surface water; and</p> <p>c) Sewage treatment plant effluent discharges (includes lagoons);</p> <p>in any of the following areas:</p> <ul style="list-style-type: none"> <li>• WHPA-E (VS ≥ 8) (future); or</li> <li>• WHPA-E (VS ≥ 4.2) in an Issue Contributing Area for Nitrates or Pathogens, <del>Sodium or Chloride</del> (future); and</li> </ul> <p>where the discharge is to land, also in:</p> <ul style="list-style-type: none"> <li>• the remainder of an Issue Contributing Area for Nitrates or Pathogens, <del>Sodium or Chloride</del> (future).</li> </ul> <p><del>d) Industrial effluent discharges, in any of the following areas:</del></p> <ul style="list-style-type: none"> <li>• WHPA-E (VS ≥ 8) (future); or</li> <li>• WHPA-E (VS ≥ 4.2) in an Issue Contributing Area for Nitrates, Pathogens or Chloride (future); and</li> </ul> <p><del>where the discharge is to land, also in:</del></p> <ul style="list-style-type: none"> <li>• <del>the remainder of an Issue Contributing Area for Nitrates, Pathogens or-Chloride (future).</del></li> </ul>	See Maps 1.1 - 1.21	<p>Future: Immediately (T-9)</p> <p>Amend OPs and ZBLs for conformity within 5 years and ZBLs within 3 years of OP approval (T-8)</p>	SWG-17  See Explanatory Notes	MON-1
	Industrial Effluent Discharges							
	Sewage Treatment Bypass Discharge to Surface Water							
	Sewage Treatment Plant Effluent Discharges (Includes Lagoons)							

COMMENTS POLICY SWG-18		
	Comments	Response
NEC	<p>13. It is unlikely that stormwater detention ponds, sanitary sewers, storage of sewage and the use of land for sewage works would be considered a permitted use in the NEP Area outside of existing urban areas, as they are usually associated with urban development. Therefore, it is unlikely that proposals for these sorts of uses would receive approval from the NEC. Septic systems and existing uses could be dealt with via the Niagara Escarpment Development Permit application process, at such time that new development was proposed on the site. As noted above, NEC staff would circulate any Niagara Escarpment Development Permit applications within identified vulnerable areas to the Source Protection RMO for their review and recommendation. The NEP currently contains development criteria related to water quality and quantity which the proposed development would already need to meet. (SWG-4, SWG-9, SWG-14, SWG-16 and SWG-18)</p>	Comment noted.

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	<p>11. We note that the effect of this policy is legally binding (List A policy) and that the NEC is considered a “planning approval authority” in this policy. As noted above, the NEC is not legally bound to implement SPP policies but, as noted in Comment 6, we support source protection and intend to incorporate a general policy in the NEP related to the protection of source water that is consistent with the intent of the <i>Clean Water Act</i>. However, we question whether the NEC should be listed for List A policies.</p> <p>12. For the reasons noted above, staff does not feel it is necessary to develop a specific policy in the NEP for each SPP policy to address this matter.</p>	<p>Staff to remove NEC from the “List A” policy tables in the Appendices. Have confirmed this revision with MOECC staff.</p>
<p><b>Town of Orangeville</b></p>	<p>While the Town acknowledges that the Town's Water Pollution Control Plant (WPCP) effluent forms a significant portion of the total Sodium and Chloride loading within the ICA for Well 10, the approved Assessment Report indicates that additional analysis is required for a link between the Sodium and Chloride in the WPCP effluent and the Sodium and Chloride in the Well 10 water supply to be established. Further, a review of the MOECC Table of Drinking Water Threats for the sub-threats identified in the proposed SWG-17 and SWG-18 policies indicates that sewage treatment plant effluent discharges are not a prescribed drinking water threat for either Sodium or Chloride. The only sub-threat considered in SWG-17 and SWG-18 that could become a significant drinking water threat for Sodium or Chloride is industrial effluent discharges to surface water in an ICA for Chloride.</p> <p>Since none of the sub-threat categories included in the proposed SWG-17 and SWG-18 policies have the potential to become a significant drinking water threat for Sodium, there is no requirement for the CTC SPC to develop a policy for these sub-threats in relation to Sodium. As such, the Town is requesting that the CTC SPC modify the proposed SWG-17 and SWG-18 policies to remove all references to ICAs for Sodium.</p> <p>Since the only sub-threat category identified in the proposed SWG-17 and SWG-18 policies that could become a significant drinking water threat in an ICA for Chloride is industrial effluent discharges to surface water, the Town is requesting that the CTC SPC revise the policies for SWG-17 and SWG-18 such that they only apply to industrial effluent discharges in an ICA for Chloride.</p>	<p>Staff propose removing Sodium and Chloride for the sub-threats identified in this policy as per Town of Orangeville comments. However, Industrial Effluent Discharges can be a significant threat in an ICA for Chloride (not Sodium) and the policy has been revised to reflect this.</p>
<p><b>Halton Region and lower tier municipalities</b></p>	<p>19. A land use planning tool cannot be used to regulate activities (e.g. combined sewer discharge). It is not feasible to determine “any use of land for any purpose that would be dependent on these sewage works”.</p>	<p>Policy wording has been revised.</p>

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Polices	Monitoring Policy
<b>NEW</b> <b>SWG-19</b>	Combined Sewer Discharge from a Stormwater Outlet to Surface Water	Town of Orangeville  CVSPA	E	<b>Research</b>  The Town of Orangeville shall undertake research to determine the extent to which the sodium and chloride loading from the Town’s Water Pollution Control Plant (WPCP) outfall into WHPA-E for Well 10 influences the rising sodium and chloride levels measured at this well and report back to the Credit Valley Source Protection Authority (CVSPA) within 2 years from the date the Source Protection Plan takes effect.	See Map 1.3	See Policy	SWG-17 SWG-18	MON-1  MON-3
	Sewage Treatment Bypass Discharge to Surface Water			The CVSPA in partnership with the Town of Orangeville shall provide the report along with recommendations to the CTC Source Protection Committee to determine whether to make a formal request to the Director pursuant to section 119 of the Technical Rules: Assessment Report under the Clean Water Act, 2006 dated November 2009 to add this water pollution control plant outfall as a Local Threat. <b>If the WPCP outfall is added as a Local Threat then policies SWG-17 and SWG-18 shall apply.</b>				
	Sewage Treatment Plant Effluent Discharges (Includes Lagoons)							

COMMENTS POLICY NEW SWG-19		
	Comments	Response
Town of Orangeville	Town of Orangeville staff would like to see the last sentence (in bold) removed from the policy.	CTC staff provided this policy in advance to Town of Orangeville staff for their comment prior to the SPC meeting. SPC to consider policy.

Red text and strikethrough = revisions that went out for public consultation  
 Highlighted text = revisions made after public consultation