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ORANGEVILLE • FERGUS • HARRISTON

February 9, 2022

Township of Southgate
185667 Grey County Road 9
RR 1
Dundalk, Ontario
N0C 1B0

Attention: Lindsay Green
Clerk

RE: Township of Southgate
White Rose Park Subdivision, Phase 3
Soils Permit Application
Council Approval Reconsideration
Our File: A4165A

Dear Ms. Green:

It is our understanding that Council is not in support of the proposed Soils Permit (Permit) application put forth by 2570970 Ontario Inc (Developer) for Phase 3 of the White Rose Subdivision at their February 2, 2022 Council meeting due to a number of concerns. Our intention is to clarify these issues and confirm what practices and controls can and will be implemented to ensure appropriate measures are taken for safeguarding of the future use of this subject site, surrounding lands and Township infrastructure.

- As required, the Grand River Conservation Authority (GRCA) approval and Permit was issued January 20, 2022.
- Concerns were raised regarding the quality of the fill, specifically the elevated levels of salt and sodium (SAR) detected in specific areas of the fill at the source site. The proponent's geotechnical consultant Peto MacCallum Ltd (PML) have indicated that this fill would be suitable for use under the proposed roads. However, the Township expressed concerns that this use could pose a long-term risk to the municipal wells, contending that this high SAR fill was not desired. To address this concern, the Developer/PML have agreed that **no high SAR fill** will be placed anywhere on the site. Further to this, it is our understanding that the fill near the surface that contained the elevated SAR has already been removed from the source site, and is no longer a potential issue.
- There were concerns regarding the haul route to bring the fill to the site. Township staff have been consulted regarding this issue and a suitable haul route has been established. The Developer has acknowledged that it is their responsibility to ensure that this route is adhered to and will be enforced by the Township. Further, the Developer has agreed that this haul route will be kept free of mud/debris, and will clean it as required.



Based on the above, we believe these previous requirements and concerns have been addressed.

We understand that Council may still be concerned with the general quality of the fill brought to the site and require further assurance, to this issue we offer the following;

- Ontario Regulation 406/19 (Reg) establishes rules/requirements for the movement of excess fill. These rules apply to both the source site and the receiving site. Therefore, the property owner of the site where the fill is coming from is also responsible to ensure that fill is ultimately placed in an appropriate location based on the intended use. Obviously, the Developer of the receiving site wants to ensure that any fill imported to his site is suitable before he accepts it. Given this, it is in both parties best interest to ensure that only suitable fill is moved.
- Fill quality and movement is controlled by a licensed professional consultant (qualified person), in this case PML, who are professional engineers and are legally bound to adhere to the Reg.
- The Reg outlines strict quality requirements along with testing, tracking and monitoring protocols to ensure that only suitable fill reaches the receiving site. PML are aware of these requirements and will ensure that they are adhered to by all parties involved in the project.

Based on the above we believe it would be reasonable for Council to reconsider the Soils Permit application and support this Permit.

We trust that this information is satisfactory and should you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

Triton Engineering Services Limited



Paul Ziegler, C.E.T.

cc/ Dave Milliner, CAO
Jim Ellis, Public Works Manager
Bev Fisher, CBO