

**Ministry of the Environment,
Conservation and Parks**

Eastern Region
Ottawa District Office
Cornwall Area Office
113 Amelia St
Cornwall ON K6H 3P1
Fax: (613) 933-7402
Tel: (613) 933-7403

**Ministère de l'Environnement, de la
Protection de la nature et des**

Parcs

Direction régionale de l'Est
Bureau du district d'Ottawa
Bureau du secteur de Cornwall
113 rue Amelia
Cornwall ON K6H 3P1
Télécopieur: (613) 933-7402
Tél:(613) 933-7403



June 6, 2019

Marc Brisson
Les Fondations Brisson Inc.
1345 Route 500 W Casselman
Casselman, Ontario, K0A 1M0
Canada

Dear Mr. Brisson:

RE: Development (Phase 2) - Former Courtaulds Site
Reference Number 0860-8N7RT2

On May 28, 2019, we met to discuss the proposed next phase of development at Belfort Estates. You have introduced some significant changes that have provided buffer between a large portion of the WDS property and residential development (moved roads, left an area undeveloped on the south of the WDS etc.)

I have discussed this Phase 2 Development with the Ministry's Technical Support Section. Technical Support concurs with the position taken during our May 28th meeting: from the perspective of ground water contamination, the Ministry does not have an objection to this phase commencing. Mr. Trimper, Regional Hydrogeologist, stated the following:

- From a groundwater perspective I have no concerns with respect to the development of the phase 2 area as proposed. Groundwater impacts are not known or suspected to exist in the area. It is possible that residual pockets of contamination may exist in the area and it should be ensured that any impacted soils or water encountered during construction activities is managed and addressed appropriately.
- I also note that site licensing and formal closure of the former Courtaulds landfill is currently being contemplated. Those activities being considered may have buffer requirements to allow for contingency activities to be undertaken. Given that a required buffer has not been determined for the landfill at this time, it may be prudent to ensure that a 50 metre buffer from the landfill property be maintained at this time. This would preclude the development of Lot 15SD as identified in the provided layout plan.
- It is understood that the development of Phase 1B is not being contemplated at this time due to the presence of THF impacts in this area. Phase 1B should not be developed until the identified THF impacts have been addressed in accordance with applicable regulatory requirements.

I would again bring to your attention that in addition to potential for environmental contamination (i.e

ground water considerations) impacting off-site, the Developer and the City need to consider that there will be operational activities at the Waste Disposal Site that could impact other land use. Land use compatibility is the responsibility of the municipality. The extent of activities likely to occur at the WDS, and therefore potential for impacts, should be better understood later this year. The Owner of the Waste Disposal Site, Nouryon Chemical LLC, has recently submitted an application for an Approval for the WDS. Once an Approval is issued it will include conditions for the ongoing operation of the closed WDS (monitoring, maintenance etc.). In addition, Nouryon Chemicals have committed to presenting remediation strategies for the Nouryon owned lands later this year.

I take this opportunity to once again highlight concerns I have raised previously, and which are raised by Mr. Trimper in the comments above. If during any work there is observation of contaminants or potential for contaminants to be present and/or mobilized, it must be managed and residential standards must be met for development to proceed. Brisson Foundations should retain all records of monitoring, observations, and corrective action if situations arise where corrective action is required.

There are also specific requirements for you to have a monitoring program in place when constructing Sewage Works under Approval # 4199-ADELZ. In the event that the Ministry conducts an Inspection, you must be able to provide all required documentation. I have attached a copy of the Approval. Condition 6.4 of the Approval requires the that *"The Qualified Person shall notify the District Manager in writing within two business days upon receipt of information indicating that any contaminant of concern has been found at a concentration greater than the value(s) appearing in the site specific Risk Assessment or greater than the Residential/Parkland/Institutional Property Use Standards appearing in Table 3 of the Soil, Ground Water and Sediment Standards for Use under Part XV.1 of the Environmental Protection Act"*. A concern here is that there is presently only an accepted generic background concentration for THF. Until a Risk Assessment value is determined for residential use, the values accepted by the Ministry in 2017 for THF contaminant must apply. As has been communicated previously, the accepted value for Generic Residential Scenario is 11,000 ug/l.

In addition to the above required actions I am requesting that if any infrastructure (sewage discharge pipes, former pipeline conveyances etc.) is observed as you construct Phase 2 that the ministry be notified. This Ministry continues to work with a number of partners to monitor the health of the St. Lawrence River and Area of Concern and results of sediment sampling indicate that residual sources may remain on the former industrial lands. Documentation of old infrastructure, and removal of same where applicable, will help in our efforts significantly and your co-operation would be greatly appreciated.

Please feel free to contact me should you have any questions or wish to discuss these matters further.

Yours truly,



Lisa Chalmers
Senior Environmental Officer
Cornwall Area Office

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cc. Mary Joyce Smith, City of Cornwall - via email
Josh Eamon, EVB Engineering - via email
Carlos DaSilva, Paterson Group - via email