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Response to Halton Region Comments
141-153 Plains Road West Proposed Development
Land Use Compatibility and Air Quality Impact Study– September 29, 2023

To Whom it may Concern,

1. Introduction

GHD was retained by 2381798 Ontario Ltd to prepare a Land Use Compatibility Study for the proposed mixed-use development (Development) to be located at 141-153 Plains Road W, Burlington (Site). This Study, dated April 27, 2023, has been prepared in support of planning applications for the Development.

The Halton Region (Region) has reviewed GHD's Land Use Compatibility Study (Study) and has provided comments regarding the study. Please find below GHD's response to the comments submitted on behalf of 2381798 Ontario Ltd.

GHD has submitted an updated copy of the Study along with this response letter. This updated Study reflects all the changes made to the modelling and language of the assessment in the process of addressing the following comments from the Region.

2. Study Review Comments

The Halton Region comments are listed below (bolded and italicized), with GHD's response following each comment.

2.1 Discussion Comments

Region Comment No. 1:

"A. Cupido Transport Limited was included in the summary; however, this operation was not mentioned further in the report. Clarification should be provided regarding this operation".

GHD Response: Revised Study to include A.Cupido Transport Limited operations. Please refer to Section 3.3.1 of the Land Use Compatibility and Air Quality Impact Study (Study) for more details.

Region Comment No. 2:

"The Compatibility Study acknowledged that the facility has the potential to adversely impact the site and that the proposed development introduces new sensitive receptors. As a result, air dispersion modelling using SCREEN3, a screening level dispersion model was conducted for the tall stack at King

Paving (dryer stack). Table 4-4 provides a summary of the stack parameter assumptions used in the model. However, no discussion was provided on how the parameters were derived. It appears that King Paving is operating under Environmental Compliance Approval (ECA) with flexibility, as a result, no stack parameters are provided in the document. Clarification should be provided on how stack parameters, including emission rate, were decided upon."

GHD Response: The stack parameters in Table 4.7 are based on parameters obtained from King Paving's previous ECA, No.2345-5JMR8N (issued to KPM Industries Ltd.). The updated modelling is based on the worst case 24-hour benzo(a)pyrene (BaP) emission rate obtained from the most recent Emission Summary Table (EST) for King Paving. This is conservative, as the 24-hour BaP emission rate is more than four times higher than the annual emission rate.

Region Comment No. 3:

"St Mary's Cement Inc. (Canada) (St Mary's Cement) operating at 1093 Howard Road is a ready-mix concrete operation. According to Table 3-4, the separation distance between the facility and the Site is 271 m, while 300 m separation distance is mentioned I the discussion following the table. According to Google Maps, the separation distance between the properties is approximately 100m; therefore, the larger distance used in the report is misleading and should be revised. Similarly, paragraph in Section 4.3 incorrectly identifies separation distance and EVA information for this facility. While this oversight does not impact the outcome of the report, it provides inaccurate information; therefore, should be revised."

GHD Response: Study was revised with correct separation distance. Please refer to Section 4.3 of the Study for more details.

Region Comment No. 4:

"The Compatibility Study acknowledged that the facility has the potential to adversely impact the development and that the proposed development introduces new elevated sensitive receptors that are located in a different direction from the existing sensitive receptors. Similar to King Paving, air dispersion modelling was conducted for the tall stack on St. Marys Cement (dust collectors). While Table 4-4 provides a summary of the stack parameters for one of them were included in the table. Does that mean that only one baghouse was modelled at the facility? Clarification should be provided on how stack parameters, including emission rate, were decided upon".

GHD Response: The stack parameters are based on source information provided in CBM Ready Mix's ECA approval No. 9841-BNUR2A. There are six baghouses at this Facility. Table 4.5 in the Study includes stack parameters of the sources located at St. Mary's/CBM Ready Mix.

The emission rates of the stack are based on the flow rate and MECP recommended outlet dust collector loading factor. The MECP recommended emission factor is 20 mg/m^3 for the most significant baghouse and 10 mg/m^3 for other units. The dust collectors were re-modelled in AERMOD. Please refer to Section 4.6 in the Study for dust collector stack parameters, emission rates and AERMOD results.

Region Comment No. 5:

"Modelling results show that predicted concentrations from sources at both King Paving and St. Marys Cement facilities are expected to be below 25% of the particulate matter limit of 120 µgm3; however, until more details regarding input parameters is provided, we cannot confirm these results are acceptable".

GHD Response: Table 4.5 in the Study includes stack parameters of the sources located at CBM Ready Mix. The stack parameters are based on CBM Ready Mix ECA approval No. 9841-BNUR2A. The emission rates of

the stack are based on the flow rate and MECP recommended outlet dust collector loading factor. The MECP recommended emission factor is 20 mg/m^3 for the most significant baghouse and 10 mg/m^3 for other units.

Table 4.7 in the Study includes stack parameters for the dryer stack located at King Paving. Based on GHD's review of the most recent EST provided by King Paving, the most significant contaminant is BaP. The air quality assessment was updated based on the worst case 24-hour BaP emission rate and the updated stack parameters

Region Comment No. 6:

"GHD acknowledged that the proposed development is in the vicinity of the major roadways and provided recommendations on Traffic Related Pollution (TRAP) mitigation strategies and good practices for residential development. The Region of Toronto publication of Avoiding the TRAP: Traffic-Related Pollution in Toronto and Options for Reducing Exposure was used as a reference for these recommendations. This guidance document is a typical and reasonable approach for development within a similar environment. However, mitigation measures tailored to the proposed development should be identified in addition to the listed generally available measures."

GHD Response: The Study was revised to include mitigation measures specific to the proposed development. Please refer to Section 4.1.2 in the Study for more details.

Region Comment No. 7:

"Wind data analysis showed that the predominant wind directions are from the west which is beneficial in respect to the nearby industry located to the north. There are two wind roses included in the report, Figure 4.1 and the figure in Appendix C. Figure 4.1 shows direction of the wind as "blowing from", while wind rose in Appendix C shows wind as "blowing to". The wind roses should be consistent to avoid any confusion as essentially, they show opposite direction if not looked carefully at the descriptions".

GHD Response: Wind roses in Appendix C were revised to show direction of the wind as "blowing from".

Region Comment No. 8:

"The authors noted that "any proposed industrial uses of the lands should be evaluated to determine future land use compatibility". It is unclear when these uses will or should be considered. Typically, they are considered in the Compatibility Study in the early planning stages".

GHD Response: GHD has reviewed development applications using the Halton Region's Development Projects Viewer current at the time of writing for proposed developments surrounding the Site. There are no new industrial uses proposed nearby to the Development. GHD is of the opinion that the proposed Development will not significantly affect the land use compatibility of the future employment uses on nearby lands, as there are existing sensitive residential land uses adjacent to the Development with similar exposure and line of sight. Any future commercial or industrial operations would need to be compatible with existing residential uses in the area.

Region Comment No. 9:

"As such, a Land Use Compatibility Assessment (including Air Quality Assessment and Noise Assessment) is required to be submitted and to support the proposed development, which may be subject to Peer Review at the cost of the applicant.

- ***In accordance with ROP policy, impacts from the nearby industrial and transportation sources of noise needs to be assessed, and appropriate recommendations/mitigation measures are to be***

implemented to address potential impacts on the proposed sensitive use as part of a development application submission".

GHD Response: Transportation sources, including Highway 403 and the nearby Aldershot rail yard, were evaluated for compatibility based on setback distance. Please refer to Section 4.1.2 of the Study for more details. Nearby industrial sources were evaluated in Section 4.2 and 4.3.

Regards,



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