



SDK Environmental Consulting & Services

June 2, 2021

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Manager of Community Planning-Planning and Development Services
Town of The Blue Mountains
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**REFERENCE: Manorwood Homes Development, Town of The Blue Mountains
Requirement for Air Quality and Odour Assessment
SDK Project P1206**

Dear Mr. Houghton,

1.0 Introduction

SDK Environmental Consulting & Services (SDK) has prepared this letter for the Town of the Blue Mountains to provide an update with respect to air quality and odour impacts for the Manorwood Development. The Site Plan Approval Application was submitted by Manorwood Homes to the Town of the Blue Mountains in April of 2021. It is our understanding that residential zoning is already approved for the subject property and that the Town requires an update with regard to air quality and odour impacts to ensure continued compatibility. A previous air quality and odour impact study was prepared by Church & Trought¹ and had formal peer review by Conestoga-Rovers & Associates². It is also our understanding the assessments were to the satisfaction of the Town of the Blue Mountains for the previous development plans.

For this assessment update, SDK Environment has reviewed the past technical reports, visited the proposed development site, consulted the local Ministry of Environment, Conservation and Parks (MECP) office and prepared this letter to document our findings.

¹ Air Quality Assessment, July 2013, Church & Trought (CTI)

² Air Quality Assessment – Peer Review, May 5, 2014, Conestoga-Rovers & Associates and CTI response to peer review June 19, 2014.

2.0 Scope of Assessment (Air Quality & Odour Impact)

SDK Environmental has performed the following tasks as part of this assignment:

- Reviewed the most recent development plan for the subject site;
- Reviewed past technical air assessment reports and accompanying peer review documents;
- Reviewed an updated air assessment report for the Thornbury Village Cider and Brew House entitled EASR ESDM Report Supplement (Draft), dated June 2019;
- Conducted a site visit on May 14, 2021 to the subject area to observe existing day time operations within proximity to the development;
- Contacted the local Ministry of Environment District Office to identify if there are any recent odour complaints or other air quality concerns in the area;
- Reviewed odour Best Management Practices Plans submitted to the Town by the Thornbury Village Cider Brew House;
- Prepared this letter to provide an update as part of the air quality assessment.

3.0 Summary of Findings

The following presents the results of our findings:

Manorwood Development Plan (2021)

The Manorwood Development Plan proposes 42 townhouse units limited to 2-storeys in height. The proposed development is situated with a single entrance off of Elgin Street, and would be located between King Street (Hwy 26) and Huron Street.

The current 2021 development plan with respect to its physical location and maximum building heights is comparable with the previous 2013 plan, which had identified 45 units, also limited 2-storeys.

Since the total unit count and building heights remains similar to the past design, we find no significant changes have occurred at the receptor side since the 2013/2014 studies that would potentially compromise land-use compatibility in terms of air quality or odour.

Site Visit Observations: May 14, 2021

In order to observe and confirm other nearby land-uses, SDK Environmental visited the site on May 14, 2021 between the hours of 9:30 AM and 2:00 PM. We toured the area encompassing the development which included:

- King Street (Hwy 26)
- Elgin Street
- Huron Street
- McAuley Street
- Arthur Street (across Hwy 26)

The weather conditions were favourable for observing potential air and odour concerns. May 14, 2021 was sunny with no precipitation and very light winds. The daytime temperature was approximately 17 degrees Celsius.

The following commercial and industrial sources of potential air impacts were identified:

- Thornbury Village Cider Brew House (located at corner of King and Elgin)
- Breaker Technology Limited (located on Elgin Street)

Both sites appeared to be operating on the day of our visit and were identified in past reports.

During the tour of the area, with a specific focus on the commercial and industrial sources identified above, we did not identify any significant odours, dust, stack plumes, or discolouration to the air in the area. We did note significant expansion activity at the Thornbury Village Cider and Brew House, which appeared to include an addition to the west side of the facility and the installation of several new stainless-steel vessels. This was explored in more detail during our review of the 2019 EASR ESDM Report Supplement prepared for the facility by Arcadis in 2019, addressed in detail later in this letter.

Consultation with local MECP District Office

SDK connected with the MECP District Office on Monday May 17, 2021 and spoke with Cara Salustro, Senior Environmental Officer (Acting) from the MECP Owen Sound District Office. Cara Salustro is the Environmental Officer with specific responsibility for Town of Thornbury.

The District Office did not identify any concerns specific to Thornbury Village Cider Brew House or Breaker Technology Limited.

Regulatory Updates since 2013-2014

There have been regulatory updates to the air quality compliance requirements in Ontario since the previous 2013-2014 air quality studies and peer reviews. Most notability would be the expansion of the

Environmental Activity and Sector Registry (EASR) as a compliance mechanism for certain facilities instead of a conventional Environmental Compliance Approval (ECA) permits. The expansion activities observed at the Thornbury Village Cider and Brew House would be subject to an EASR registration.

In terms of the technical assessment of air contaminants, the EASR requirements are similar to the ECA requirements and use the same air dispersion model and contaminant concentration compliance criteria. The air contaminant criteria are required to be met at ground-level of the commercial/industrial facility property boundary (and anywhere beyond).

In terms of odour, there have been updates to EASR which includes the need of an Odour Best Management Practices Plan (BMPP) for certain facilities within the identified set-back distances to sensitive receptors (houses, schools, hospitals, etc). The purpose of a BMPP is to specifically manage and prevent potential odour releases to ensure community impacts are minimized. Craft breweries (in this case Thornbury Village Cider and Brew House) would reasonably be required to complete a BMPP for the current setback to existing residential properties in the area.

In review of documents on record with the Town of the Blue Mountains, SDK has obtained the draft EASR ESDM Report Supplement and BMPP for the Thornbury Cider and Brew House facility prepared by Arcadis. The draft report submitted to the town does not identify any air contaminants of significance and has provided detailed measures to manage odours in their BMPP, as required under EASR. Provided that the brewery follows the measures outlined in the BMPP, which is an existing requirement for this facility irrespective of the proposed development, there should be no concerns for odour impacts to the development.

SDK notes that we were not able to find the finalized EASR registration for the Thornbury Village Cider and Brew House on the MECP Access Environment database. This would be a necessary regulatory requirement for the facility expansion.

4.0 Conclusions

Based on our site visit, consultation with the Ministry and detailed technical review of the background documentation, we conclude that the land-uses remain compatible each other in terms of air quality and odour impacts.

If there are any questions pertaining to this report, please do not hesitate to contact us.



Yours truly,
SDK Environmental



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