

August 10, 2026

Attention: Kelly Williams, CEO
Acclaim Health
2370 Speers Road
Oakville, ON L6L 5M2

SLR Project No.: 241.032578.00001

Revision: 0

**RE: Land Use Compatibility Consultation
2250 Speers Road, Oakville**

SLR Consulting (Canada) Ltd. ("SLR") (then Novus Environmental Inc.) previously prepared an Air Quality and Land Use Compatibility Report for the Temporary Use By-law application for 2250 Speers Road in 2019. On September 13, 2025, the proponent with Bousfields attended a Pre-Consultation Meeting with Town Staff to submit a Zoning By-law Amendment (ZBA) application to permit the existing Dementia Care Centre on the subject site on a permanent basis.

SLR Consulting (Canada) Ltd. ("SLR") was retained by Acclaim Health ("the Client") to prepare an Air Quality and Land Use Compatibility letter to confirm previous findings along with addressing any updates since the original study was completed. This letter has been prepared in support of the ZBA application submitted by the Client for the existing site located at 2250 Speers Road (the "Project").

1.0 Description of the Project Site and Surrounding Area

1.1 Project Site

The Project site is located at 2250 Speers Road between Third Line and Bronte Road, in Oakville, Ontario. The Project site is currently occupied by Acclaim Health. The Project site is currently used as a 1- storey dementia care centre with adult day programming, support classrooms / meetings room, and a short-term caregiver relief programs involving eight (8) overnight respite rooms. There are a number of mitigation measures implemented into the design of the building that are considered to help mitigate potential nuisances from the surroundings, including:

- The windows of the development are sealed (inoperable);
- HVAC equipment air intakes on the units are located easterly on the rooftop, away from Speers Road; and
- the small outdoor courtyard is fenced and setback from Speers Road away from the industrial area.

1.2 Surrounding

Surrounding the proposed development are commercial and light industrial properties to the northeast and southwest. Directly surrounding the proposed development exists a mix of commercial space and industrial uses, with a large residential area northeast through southeast of Project site. North and west of Speers Road is an industrial area. Within the office employment area south of Speers Road, there are other sensitive uses including:

- Acclaim Health, Head Office and Nursing Clinic, at 2370 Speers Rd;
- Oakville Community Church – The Salvation Army, at 2270 Speers Rd;
- Live to Dance Academy, at 2210 Speers Rd.

1.3 Town of Oakville Zoning

The Town of Oakville Zoning by-law 2014-014 currently describes the zoning of the site as Temporary Use ‘Office Employment’ (zone code: T2-E1) and is described on map ‘19 (5)’. The current zoning designation permits the use of adult care and daycare uses, however the re-zoning application is to permit the use of overnight respite care at the Site on a permanent basis. Figure 2 shows the zoning map of the surrounding area the development site.

The land uses just south of Speer Road are designated as ‘Office Employment’ (E1), with land uses north of Speers Road designated as ‘Industrial’ (E3). All lands south of the Project are low density residential, ‘Residential Low’ (RL3-0, RL5-0)

2.0 Assessment Framework

The intent of this report is to identify any existing and potential land use compatibility issues and to identify and evaluate options to achieve appropriate design, buffering and/or separation distances between the surrounding sensitive land uses, including residential uses, and nearby Employment Areas and/or major facilities. Recommended measures intended to eliminate or mitigate negative impacts and adverse effects are provided.

The requirements of the Ontario planning regime are organized such that generic policy is informed by specific policy, guidance, and legislation, as follows:

- The Ontario Planning Act, Section 2.1 – sets the ground rules for land use planning in Ontario, whereby planning decisions have regard to matters of provincial interest including orderly development, public health, and safety; then
- The Provincial Planning Statement (“PPS”) sets out goals – making sure adjacent land uses are compatible from a health and safety perspective and are appropriately buffered; then
- The Halton Region Land Use Compatibility Guidelines (“LUCG”) developed by the Region to “identify how land use compatibility issues may be addressed by municipalities during a development proposal...” The LUCG were developed by the Region in consideration of the Provincial D-Series of Guidelines, prepared by the Ontario Ministry of Environment, Conservation & Parks (“MECP”). These guidelines set out methods to determine if assessments are required (Areas of Influence, Recommended Minimum Separation Distances, and the need for additional studies); then



- The MECP D-series of guidelines set out methods to determine if assessments are required (Areas of Influence, Recommended Minimum Separation Distances, and the need for additional studies); then
- MECP and Municipal regulations, policies, standards, and guidelines then set out the requirements of additional air quality studies and the applicable policies, standards, guidelines, and objectives to ensure that adverse effects do not occur.

2.1 Ontario Planning Act

The Ontario Planning Act is provincial legislation that sets out the ground rules for land use planning in Ontario. It describes how land uses may be controlled, and who may control them. “The purpose of the Act is to:

- provide for planning processes that are fair by making them open, accessible, timely and efficient;
- promote sustainable economic development in a healthy natural environment within a provincial policy framework;
- provide for a land use planning system led by provincial policy;
- integrate matters of provincial interest into provincial and municipal planning decisions by requiring that all decisions be consistent with the Provincial Planning Statement and conform/not conflict with provincial plans;
- encourage co-operation and coordination among various interests;
- recognize the decision-making authority and accountability of municipal councils in planning”¹

Section 2.1 of the Ontario Planning Act describes how approval authorities and Tribunals must have regard to matters of provincial interest including orderly development, public health, and safety.

2.2 Provincial Planning Statement

The PPS “provides policy direction on matters of provincial interest related to land use planning and development. As a key part of the Ontario policy-led planning system, the Provincial Planning Statement sets the policy foundation for regulating the development and use of land. It also supports the provincial goal to enhance the quality of life for all Ontarians.”

The PPS is a generic document, providing a consolidated statement of the government policies on land use planning and is issued under section 3 of the Planning Act. Municipalities are the primary implementers of the PPS through policies in their local official plans, zoning by-laws and other planning related decisions.

The Province of Ontario approved PPS came into effect on October 20, 2024. Policy direction concerning land use compatibility is provided in the following sections of the PPS.

¹ <https://www.ontario.ca/document/citizens-guide-land-use-planning/planning-act>



“Policy 2.8.3: In addition to Policy 3.5, on lands within 300 metres of employment areas, development shall avoid, or where avoidance is not possible, minimize and mitigate potential impacts on the longterm economic viability of employment uses within existing or planned employment areas, in accordance with provincial guidelines.

Policy 3.5.1: Major facilities and sensitive land uses shall be planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term operational and economic viability of major facilities in accordance with provincial guidelines, standards and procedures.

Policy 3.5.2: Where avoidance is not possible in accordance with Policy 3.5.1, planning authorities shall protect the long-term viability of existing or planned industrial, manufacturing or other major facilities that are vulnerable to encroachment by ensuring that the planning and development of proposed adjacent sensitive land uses is only permitted if potential adverse affects to the proposed sensitive land use are minimized and mitigated, and potential impacts to industrial, manufacturing or other major facilities are minimized and mitigated in accordance with provincial guidelines, standards and procedures.

The goals of the PPS are implemented through Municipal and Provincial policies, as discussed below. Provided the Municipal and Provincial policies, guidelines, standards, and procedures are met, the requirements of the PPS will be met.

2.3 Halton Region Regional Official Plan Guidelines: Land Use Compatibility Guidelines

The purpose of the Land Use Compatibility Guidelines developed by the Halton Region (LUCG) is to “identify how land use compatibility issues may be addressed by municipalities during a development proposal...” The LUCG were developed by Halton Region in consideration of the Provincial D-Series of Guidelines, prepared by the MECP in 1995 for planning guidance in evaluating land use compatibility. Section 2 of the LUCG identifies the relevant provincial guidelines and regulations which are to be considered in conducting air quality assessment in Ontario:

“The D-Series are used for development applications that require the re-designation (Official Plan Amendment) or rezoning of land uses (Zoning By-law amendment). The MOE’s D-Series are only applicable when a:

- New sensitive land use requires a land use amendment and is proposed to be located within the influence, or potential influence, area of an impacting use, such as an existing industrial land use; or when a*
- New industrial use requires a land use amendment and is proposed to be located near an existing sensitive residential use.”*

Included in the Halton Region summary is a discussion of the “potential Areas of Influence” approach, as presented in the D-series of guidelines when assessing compatibility of industrial uses with more sensitive uses such as residences.

In preparing the LUCG, Halton Region has clarified an aspect concerning Recommended Minimum Separation Distances. In the LUCG, it is understood that Areas of Influence of various industrial processes will be site specific.



Actual Areas of Influence are determined through appropriate studies allowing for industrial activities to be compatible with more sensitive land uses within the Area of Influence and within Recommended Minimum Separation Distances which are presented in Table 1. Appropriate studies can provide mitigation strategies, if required.

2.4 Halton Region Regional Official Plan Guidelines: Air Quality Guidelines

The Halton Region Air Quality Guidelines (AQG) were developed along with a number of other guidelines for land use planning which came out of the Halton Region Official Plan Amendment (ROPA 38). In general terms, the AQG recommends consideration of local industrial sources and transportation features when evaluating the siting of a residential land use.

The AQG acts as a summary document of the applicable guidelines for a particular undertaking.

“2.1 Under the Region’s policy 143(12), any source emission studies may only be applicable when sensitive land uses (residential, natural heritage) are proposed with these 3 conditions present:

- 1 Within 30 m of a major arterial road or provincial highway or within 150 m of provincial freeway;*
- 2 In proximity to an industrial use; and a*
- 3 Utility use”*

SLR conducted a review of identified industrial uses and roadways/highways, as referred to in items 1) and 2) of Section 2.1, of the AQG listed above.

2.5 D-Series of Guidelines

The D-series of guidelines were developed by the MECP in 1995 as a means to assess Recommended Minimum Separation Distances and other control measures for land use planning proposals in an effort to prevent or minimize ‘adverse effects’ from the encroachment of incompatible land uses where a facility either exists or is proposed. D-series guidelines address sources including sewage treatment (Guideline D-2), gas and oil pipelines (Guideline D-3), landfills (Guideline D-4), water services (Guideline D-5) and industries (Guideline D-6).²

For this assessment, the applicable guideline is Guideline D-6 - *Compatibility between Industrial Facilities and Sensitive Land Uses*.

Sensitive Land Use is defined in the D-Series Guidelines as:

“A building, ‘amenity area’ or outdoor space where routine or normal activities occurring at reasonably expected times would experience 1 or more ‘adverse effect(s)’ from contaminant discharges generated by a nearby ‘facility’. The ‘sensitive land use’ may be a part of the natural or built environment. Depending upon the particular ‘facility’ involved, a sensitive land use and associated activities may include one or a combination of:

- I. residences or facilities where people sleep (e.g. single and multi-unit dwellings, nursing homes, hospitals, trailer parks, camping grounds, etc.). These uses are considered to be sensitive 24 hours/day.

² <https://www.ontario.ca/page/environmental-land-use-planning-guides>



- II. a permanent structure for non-facility related use, particularly of an institutional nature (e.g. schools, churches, community centres, day care centres).
- III. certain outdoor recreational uses deemed by a municipality or other level of government to be sensitive (e.g. trailer park, picnic area, etc.).
- IV. certain agricultural operations (e.g. cattle raising, mink farming, cash crops and orchards).
- V. bird/wildlife habitats or sanctuaries.”

Adverse effect is a term defined in the Environmental Protection Act and “means one or more of

- impairment of the quality of the natural environment for any use that can be made of it,
- injury or damage to property or to plant or animal life,
- harm or material discomfort to any person,
- an adverse effect on the health of any person,
- impairment of the safety of any person,
- rendering any property or plant or animal life unfit for human use,
- loss of enjoyment of normal use of property, and
- interference with the normal conduct of business”.

2.5.1 Guideline D-6 Requirements

The guideline specifically addresses issues of air quality, odour, dust, noise, and litter. To minimize the potential to cause an adverse effect, Areas of Influence and Recommended Minimum Separation Distances are included within the guidelines. The Areas of Influence and Recommended Minimum Separation Distances from the guidelines are provided in the table below.

Table 1: Guideline D-6 - Potential Areas of Influence and Recommended Minimum Separation Distances for Industrial Land Uses

Industry Classification	Area of Influence	Recommended Minimum Separation Distance
Class I – Light Industrial	70 m	20 m
Class II – Medium Industrial	300 m	70 m
Class III – Heavy Industrial	1000 m	300 m



Industrial categorization criteria are supplied in Guideline D-6, and are shown in the following table:

Table 2: Guideline D-6 - Industrial Categorization Criteria

Category	Outputs	Scale	Process	Operations / Intensity	Possible Examples
Class I Light Industry	- Noise: Sound not audible off-property - Dust: Infrequent and not intense - Odour: Infrequent and not intense - Vibration: No ground-borne vibration on plant property	- No outside storage - Small-scale plant or scale is irrelevant in relation to all other criteria for this Class	- Self-contained plant or building which produces/ stores a packaged product - Low probability of fugitive emissions	- Daytime operations only - Infrequent movement of products and/ or heavy trucks	- Electronics manufacturing and repair - Furniture repair and refinishing - Beverage bottling - Auto parts supply - Packaging and crafting services - Distribution of dairy products - Laundry and linen supply
Class II Medium Industry	- Noise: Sound occasionally heard off-property - Dust: Frequent and occasionally intense - Odour: Frequent and occasionally intense - Vibration: Possible ground-borne vibration, but cannot be perceived off-property	- Outside storage permitted - Medium level of production allowed	- Open process - Periodic outputs of minor annoyance - Low probability of fugitive emissions	- Shift operations permitted - Frequent movements of products and/ or heavy trucks with the majority of movements during daytime hours	- Magazine printing - Paint spray booths - Metal command - Electrical production - Manufacturing of dairy products - Dry cleaning services - Feed packing plants



Category	Outputs	Scale	Process	Operations / Intensity	Possible Examples
Class III Heavy Industry	- Noise: Sound frequently audible off property - Dust: Persistent and/ or intense - Odour: Persistent and/ or intense - Vibration: Ground-borne vibration can frequently be perceived off-property	- Outside storage of raw and finished products - Large production levels	- Open process - Frequent outputs of major annoyances - High probability of fugitive emissions	- Continuous movement of products and employees - Daily shift operations permitted	- Paint and varnish manufacturing - Organic chemical manufacturing - Breweries - Solvent recovery plants - Soaps and detergent manufacturing - Metal refining and manufacturing

2.5.2 Requirements for Assessments

Guideline D-6 requires that studies be conducted to assess impacts where sensitive land uses are proposed within the Potential Area of Influence of an industrial facility. This report is intended to fulfill this requirement.

The D-series guidelines reference previous versions of the air quality regulation (Regulation 346). However, the D-Series of guidelines are still active, still represent current MECP policy and are specifically referenced in numerous other current MECP policies. In applying the D-series guidelines, the current policies, regulations, standards, and guidelines have been used (e.g., Regulation 419).

2.5.3 Recommended Minimum Separation Distances

Guideline D-6 also *recommends* that no sensitive land use be placed within the Recommended Minimum Separation Distance. However, it should be noted that this is a recommendation only. Section 4.10 of the Guideline allows for development within the Recommended Minimum Separation Distance, in cases of redevelopment, infilling, and transitions to mixed use, provided that the appropriate studies are conducted and that the relevant air quality and noise guidelines are met.

3.0 Nearby Industries

The Guideline D-6 Separation distances from the Project site are shown in Figures 4 and 5. SLR personnel conducted a site visit to the area on November 20, 2025. Local industries within 1 km of the Project site were inventoried. The lands surrounding the Project site are generally comprised of commercial, residential and employment uses.



In Ontario, facilities that emit significant amounts of contaminants to the environment are required to obtain and maintain an Environmental Compliance Approval (“ECA”) from the MECP or submit an Environmental Activity and Sector Registry (“EASR”). ECAs/ EASRs within 1 km of the site were obtained from the MECP *Access Environment* website³.

Table 3 lists the identified industries within 1000 m of the Project site and within their applicable Area of Influence. A more detailed table of all industries within 1000 m is provided in Attachment B. Industries which lie within their applicable Area of Influence in respect to the Project are discussed further below.

Table 3: Identified Industries Within the Potential Area of Influence of the Project Site

Facility	Address	Type of Operation	ECA/EASR Number	Industry Class	Area of Influence Dist. (m)	Actual Dist. to Site (m)
Vacant (formerly M&G Steel Holdings)	2285 Speers Rd	Potential Future Industry Site	7691-A6BN7R	Potential Class II/ Class III	1000	110
Monarch Plastics	2335 Speers Rd	Plastic Bottle Manufacturing	5805-AHXPHN	Class III	1000	185
Mauser Packaging Solutions	2240 Wyecroft Rd	Plastic Packaging	8771-A9DJDC (2016)	Class III	1000	410
Procor	2001 Speers Rd	Tanker and Railcar Repair	0745-8DFMXJ R-010-1110624682 (2024)	Class III	1000	650
Mancor Canada	2485 Speers Rd	Metal Manufacturing	5864-8TMHJP	Class III	1000	755
North American Hard Chrome	2230 Speers Rd	Hard Chrome Plating	2824-6PARNH	Class II	300	35
OE Banquet & Conference Centre, and International Union of Operating Engineers Local 793	2245 Speers Rd	Crane Operator School	-	Class II	300	25
Acuren/Tacten Inc.	2180 Speers Rd	Engineering Consultants	-	Class II	300	210

³ <https://www.accessenvironment.ene.gov.on.ca/AEWeb/ae/GoSearch.action>



Facility	Address	Type of Operation	ECA/EASR Number	Industry Class	Area of Influence Dist. (m)	Actual Dist. to Site (m)
Oakville Stamping & Bending	2200 Speers Rd	Manufacturer and Distributor of Plumbing Products	4080-9EJLQJ (2013)	Class II	300	160
2134967 Ontario Limited (Mohawk Medbuy Corporation)	2189 Speers Rd	Health-care Distribution Centre	1498-7GDP43	Class II	300	165
Vacant Lot (formerly HPG Inc.)	2240 Speers Rd	Potential Future Industry Site	-	Potential Class II/ Class III	300	0
Jelinek Cork Ltd.	2260 Speers Rd	Building Materials Store	-	Class I	70	0

4.0 Air Quality, Dust and Odour Assessment Review of Industrial Sources

4.1 Guidelines and Regulations

Within Ontario, facilities which emit significant amounts of contaminants to the environment are required to obtain and maintain an ECA from the MECP or submit an EASR. Facilities with an ECA/EASR should already meet the MECP guidelines for air quality contaminants at their property line.

4.2 Air Quality

Under O.Reg. 419/05, a facility is required to meet prescribed standards for air emissions at their property boundary line and any location off-site. The MECP does not require industries to assess their emissions at elevated points off-site if a receptor does not exist at that location. While the introduction of mid-rise or high-rise residential buildings could trigger a facility to re-assess compliance at new, elevated receptor locations, the introduction of new low-rise receptors does not introduce a new condition related to demonstrating compliance, as the facility is already required to be in compliance at grade-level at the property line of the operating industry.

4.3 Odour

There are a select few compounds that are provincially regulated from an odour perspective; however, there is no formal regulation with respect to mixed odours. Impacts from mixed odours produced by industrial facilities are generally only considered and regulated by the MECP in the presence of persistent complaints (ECO 2010).



The MECP assesses mixed odours, in Odour Units, following draft guidelines. One odour unit (1 OU) has been used as a default threshold. This is the concentration at which 50 % of the population will just detect an odour (but not necessarily identify/recognize or object to it). Recognition of an odour will typically occur between 3 and 5 odour units. The following factors may be considered:

- **Frequency** – How often the odour occurs. The MECP typically allows odours to exceed 1 OU with a 0.5 % frequency.
- **Intensity** – The strength of the odour, in odour units. 1 OU is often used in odour assessments in Ontario.
- **Duration** – How long the odour occurs.
- **Offensiveness** – How objectionable the odour is.
- **Location** – Where the odour occurs. The MECP assesses at odours where human activity is likely to occur.

The MECP has decided to apply odour-based standards to locations “where human activities regularly occur at a time when those activities regularly occur,” which is generally accepted to be places that would be considered sensitive such as residences and public meeting places.

4.4 Dust

Ontario Regulation 419/05 also provides limits for dust, including limits for suspended particulates and dust fall. Under Reg. 419/05, these air quality limits must be met at the property line and all points beyond. This is not changed by the addition of the Project site. That is to say, the existing mutual property line is already a point of reception for dust, and the limits must already be met at that location.

4.5 Cumulative Assessments

Cumulative impact assessments, examining the combined effects of individual industries, or the combined effects of industry and roadway emissions, are generally not required. Neither the PPS, the D-Series of guidelines, Regulation 419/05, or the current MECP odour assessment protocols require an assessment of cumulative impacts.

Which is not to say that such assessments are never warranted; rather, the need to do so is considered on a case-by-case basis, depending on the nature and intensity of the industrial operation(s), and the nature of the pollutants released. Based on the types of pollutants released by the industries in this area, cumulative effects assessments are not warranted.

4.6 Local Meteorology

Surface wind data was obtained to generate a wind rose from data collected at the Burlington Piers Meteorological station from 1991 to 2015, as shown in Figure 5. As can be seen in the wind rose, predominant winds are from the west and southwest quadrants, while winds from the northwest, south and southeast may be less frequent.



4.7 Site Visits and Odour and Dust Observations

A site visit was conducted to the area on November 24, 2025, by SLR personnel to review the identified industries in the area and confirm whether there have been any changes since the last study in 2019. During the site visit, the staff members observed existing industries from the sidewalks and other publicly accessible areas. Wind conditions during the site visit were noted as:

- November 24, 2025 south westerly winds, 10 km/h, 7°C, 65 %RH

No odours or fugitive dust emissions were detected at the Project site during the site visit, or in the vicinity of the employment lands.

The site visit observations are consistent with the previous visits to area conducted in 2019, in which no odours or dust were observed near the Project site.

4.8 Assessment of Potential Air Emissions

To confirm the findings of the previous Air Quality and Land Use Compatibility Study prepared for the Project site in 2019, SLR conducted a site visit and reviewed current information for the surrounding area. The site visit and review confirmed that land uses in the vicinity of the Project site remain generally consistent with those described and assessed in the previous study; including existing sensitive uses such as the Salvation Army Oakville Community Church at 2270 Speers Road, and low density, detached residential uses located 50 m southeast of the Project site. New industrial land uses within the area of influence from the Project that were identified are assessed further below. There have no significant changes to the Project site that would alter the findings of the previous study for the existing land uses.

The Project site is a one-storey sensitive use and therefore does not include any elevated points of reception that might trigger a change in how compliance is evaluated for the existing industries. As the industries are required to meet all provincial regulations for air quality at their property line and beyond, the Project site will be compatible from a compliance perspective with the surrounding industries. Only one industry located within the area of influence was noted to have an updated environmental approval, 2063 Speers Rd which is assessed further below. The air quality study focused on the potential for nuisance impacts, including odours and dust, from the industrial operations. Acclaim Health confirmed that there have been no odour complaints or concerns from either staff or guests at the 2250 Speers Road site.

The following are changes that were observed upon reviewing the surrounding industries and observations made during the site visit.

4.8.1 2063 Speers Road

Procor Limited (Procor) was assessed in the 2019 Air Quality and Land Use Compatibility Study. Since then it was determined that there is an updated air permit registered to Procor Limited. The site holds an EASR registration dated May 9, 2024. The EASR registration notes that all contaminants emitted from the facility are below their respective standards, guidelines, or screening levels. The EASR also notes that there are no sources of fugitive dust to be managed at the site, however due to the NAICS code that is registered for the facility, the site holds an odour best management practices plan and an odour control report.



Based on the emission summary table provided as part of the EASR registration, there are a number of contaminants emitted with odour-based standards that are below their respective standards at their property line. As the Project is a one-storey building, if the odour-based standards are being met at the property line then the Project will also meet compliance. The Project is located 650m southwest of the Procor property, and there are existing residences located in closer proximity and in a similar wind direction to Procor. During the site visit no odours were detected from Procor at grade level. Therefore, the facility is still considered to be compatible with the Project site and remains consistent with the findings of the previous study.

4.8.2 2939 Speers Road

A change identified since the previous study is the permanent closure of the Praxair Canada facility formerly located at 2393 Speers Road. The site is now occupied by T.D. Smith Transport, a company specializing in the transportation of food-grade liquid and dry bulk materials. The facility also contains wash bays used to wash and sanitize the transport trucks between transport. No updated compliance approval was found for the current operations. Given the nature of the operations, light to no odours would be expected from the wash bay that would mainly occur at low levels near to the industry.

Given the change in operations, the facility is now classified as a Class II Medium Industry with a Potential Area of Influence of 300 m. The facility is located approximately 520 m southwest from the Project site, which lies outside the Potential Area Influence. Therefore, the T.D. Smith Transport facility is anticipated to be compatible with the Project site from an air quality perspective, and additional assessment is not warranted.

4.8.3 2240 Wyecroft Road

The facility previously identified as Ropak, located at 2240 Wyecroft Road, is now operating as Mauser Packaging Solutions. There is an existing Environmental Compliance Approval number 8771-A9DJDC (2016) registered to the address that remains active. Although it is not clear if the current ownership maintains the same operational processes as previously conducted by Ropak, they are still required to maintain compliance with O.Reg. 419/05 at their property line and beyond. The facility is considered a Class II industrial use and is located more than 450m from the Project. Based on a review of the industry's website and aerial imagery, emissions of odour or dust are not expected from the facility. This is concluded from the fact that there is no outdoor storage, tall rooftop stacks, and there were no odour or visible dust detected during the site visit. Therefore, the facility is still considered to be compatible with the Project site and remains consistent with the findings of the previous study.

4.8.4 2189 Speers Road

The facility located at 2189 Speers Road, previously identified as Plexxus, has undergone an amalgamation with Mohawk Medbuy Corporation and now operates as a single consolidated entity. The facility continues to operate as a distribution hub for health care products. This change is to corporate structure only and is not anticipated to affect the facility's operations. No further changes to the facility's operations or on-site activities were identified. The facility remains a Class II industrial use and is located 165m from the Project. Based on a review of the industry and aerial imagery, emissions of odour or dust is not expected from the facility. This is concluded from the fact that there is no outdoor storage, tall rooftop stacks, and there were no odour or visible dust detected during the site visit.



The facility acts as a distribution hub with the loading bays located on the west wide of the building facing away from the Project. As there have been no changes to the facility's operations, compatibility with the Project site remains consistent with the findings of the previous study.

4.8.5 Future Uses and Vacant Lots

For any new industrial uses in the area the presence of the Project will not cause any additional compliance burden on future industry, or the expansion of any existing industrial sites. Any new industrial uses will have to maintain compliance with air quality regulations at their property and beyond including the Project site. As the Project is a one-storey building it does not introduce new elevated points of the reception that are not currently existing from a compliance perspective.

As noted above there are odour mitigation measures in place at the development should a new industrial use be introduced to the area with the potential to emit odours. The AHU and outdoor spaces are setback from Speers Rd closer to the existing residential area and there are no operable windows on the Project site.

4.8.5.1 2240 Speers Road

The facility located at 2240 Speers Road, formerly occupied by HPG Inc. is no longer operating at this location and the site is now vacant. Based on the property's E1 (Office Employment) zoning, future development uses may include class I or class II industrial uses. Any new industrial uses at this location will have to maintain compliance with air quality regulations at their property and beyond including the Project site. The new operator would have to seek an environmental approval for all emissions to air from the MECP and meet compliance with O.Reg. 419/05.

4.8.5.2 2285 Speers Road

The facility located at 2285 Speers Road, formerly occupied by M&G Steel Holdings is no longer operating at this location and the site is now vacant. Based on the property's E3 (Industrial) zoning, future development uses may include class II or class III industrial uses. Any new industrial uses at this location will have to maintain compliance with air quality regulations at their property and beyond including the Project site. The new operator would have to seek an environmental approval for all emissions to air from the MECP and meet compliance with O.Reg. 419/05.



5.0 Conclusions

SLR Consulting (Canada) Ltd. ("SLR") (previously. Novus Environmental Inc.) previously prepared an Air Quality and Land Use Compatibility Report for the Temporary Use By-law application for 2250 Speers Road in 2019. On September 13, 2025, the proponent with Bousfields attended a Pre-Consultation Meeting with Town Staff to submit a Zoning By-law Amendment (ZBA) for a change in compliance for the existing industrial uses, as there were no observations of odour or dust from the surrounding industrial uses at or near the Project site, and there are existing sensitive uses located in close proximity to the Project site. Acclaim Health has also confirmed that since opening there have been no odour complaints or concerns from either the staff or guests at the 2250 Speers Road site. The changes identified in the surrounding area do not change the conclusions of the previous study. Therefore, the Project site continues to be considered compatible with its surrounding land uses from an air quality perspective.

6.0 Statement of Limitations

This report has been prepared by SLR Consulting (Canada) Ltd. (SLR) for Acclaim Health (Client) in accordance with the scope of work and all other terms and conditions of the agreement between such parties. SLR acknowledges and agrees that the Client may provide this report to government agencies, interest holders, and/or Indigenous communities as part of project planning or regulatory approval processes. Copying or distribution of this report, in whole or in part, for any other purpose other than as aforementioned is not permitted without the prior written consent of SLR.

Any findings, conclusions, recommendations, or designs provided in this report are based on conditions and criteria that existed at the time work was completed and the assumptions and qualifications set forth herein. SLR may have used artificial intelligence (AI) in the preparation of this document. Should SLR use AI, any information and analysis resulting therefrom will be reviewed for accuracy.

This report may contain data or information provided by third party sources on which SLR is entitled to rely without verification and SLR does not warrant the accuracy of any such data or information.

Nothing in this report constitutes a legal opinion nor does SLR make any representation as to compliance with any laws, rules, regulations, or policies established by federal, provincial territorial, or local government bodies, other than as specifically set forth in this report. Revisions to legislative or regulatory standards referred to in this report may be expected over time and, as a result, modifications to the findings, conclusions, or recommendations may be necessary.



7.0 Closure

Should you have any questions or require further clarification regarding the contents of this letter, please do not hesitate to contact us.

Regards,

SLR Consulting (Canada) Ltd.



Alice Najjar, B.A.
Air Quality Scientist
anajjar@slrconsulting.com

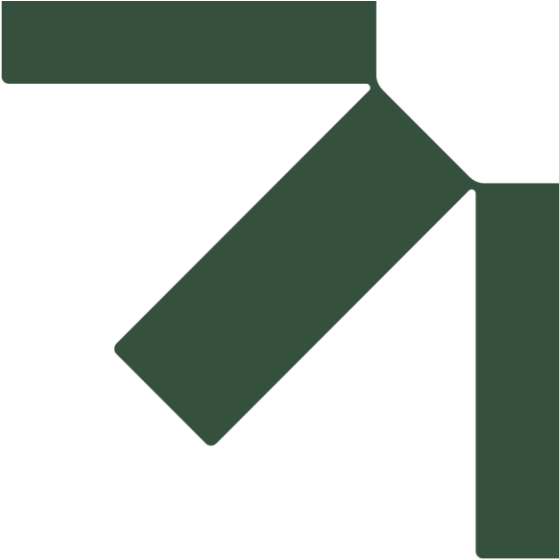


Laura Clark, P.Eng.
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lclark@slrconsulting.com

Attachments Figures
 Surrounding Industry List
 2019 Air Quality and Land Use Compatibility Report

Copy Nigel Taylor M.Sc., EP – Service Line Director Environmental Sciences, Canada





Attachment A Figures

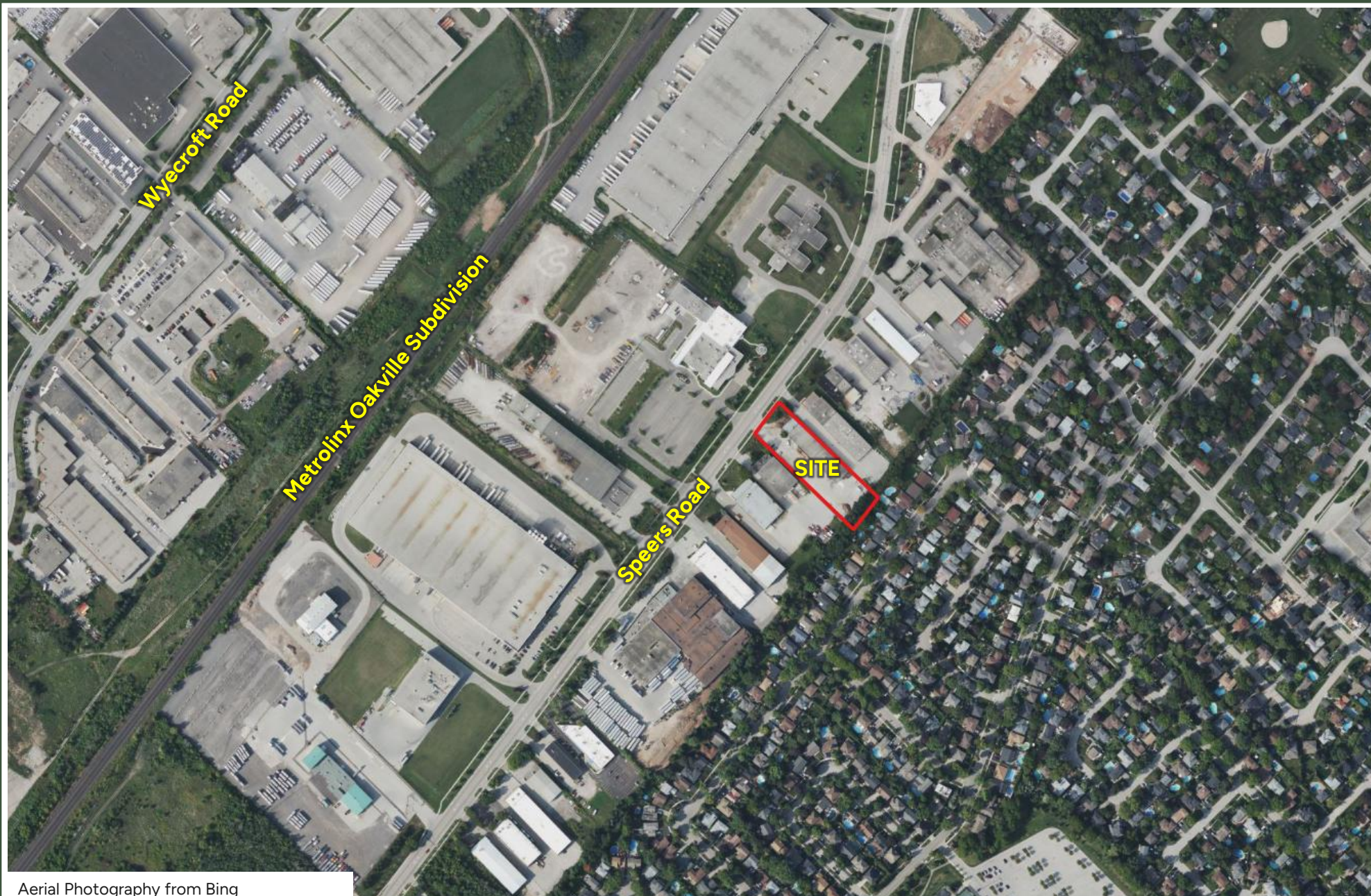
Land Use Compatibility Consultation

2250 Speers Road, Oakville

Acclaim Health

SLR Project No.: 241.032578.00001

August 10, 2026



Aerial Photography from Bing

ACCLAIM HEALTH

2250 SPEERS ROAD - OAKVILLE, ONTARIO

SITE AND CONTEXT PLAN

True North



Scale: 1:1,500

Date: Aug 10, 2026 Rev 0.0

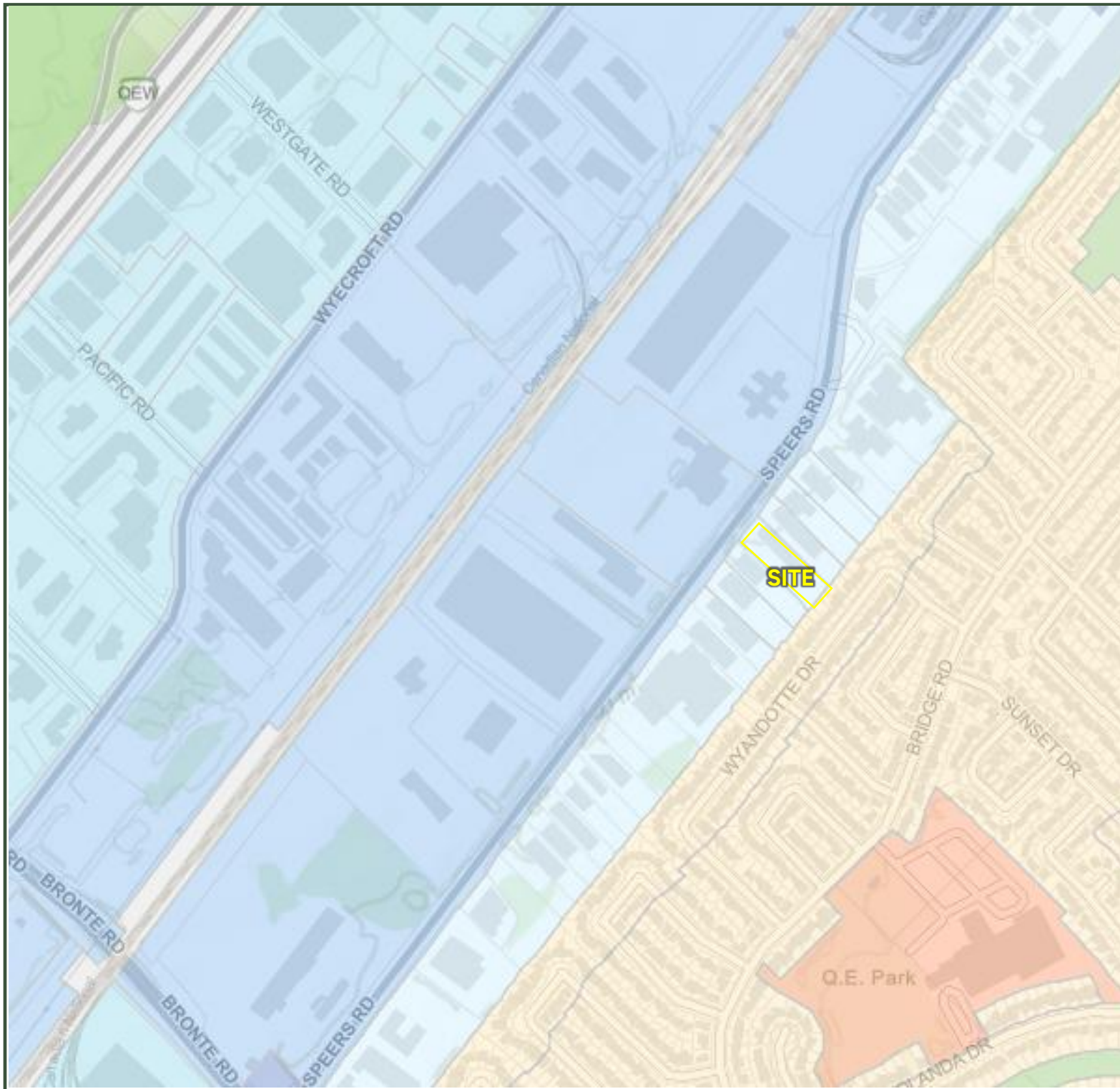
Project No. 241.032578.00001

METRES

Figure No.

1





Legend

- E1 – Office Employment
- E2 – Business Employment
- E3 – Industrial
- CU – Community Use
- O1 – Park
- RL – Residential Low

True North



ACCLAIM HEALTH

2250 SPEERS ROAD - OAKVILLE,
ONTARIO

AREA ZONING MAP

<https://ext.maps.mississauga.ca/Html5Viewer/index.html?viewer=izbl.HTML5>

Scale:

METRES

Date: Aug 10, 2026

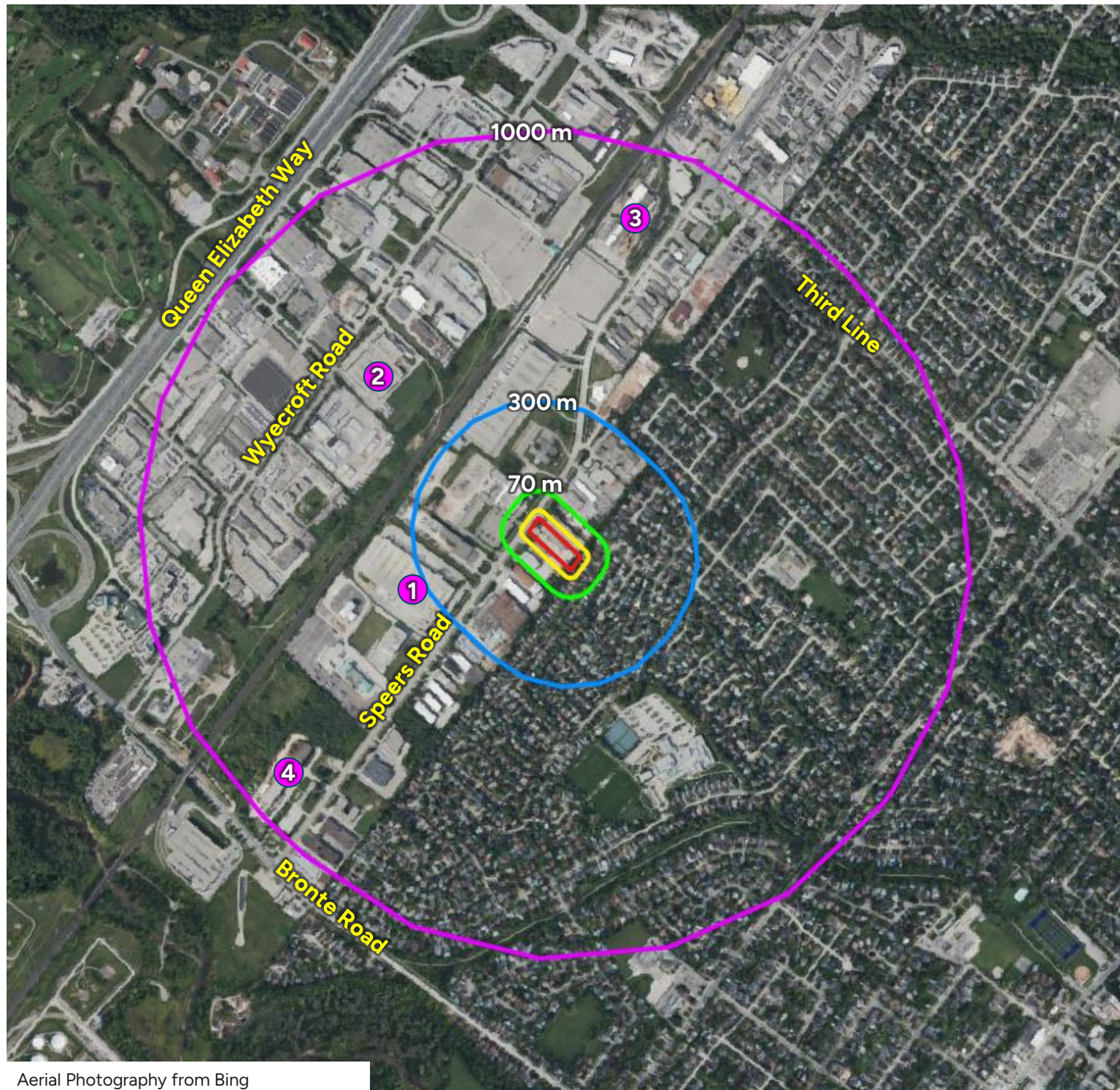
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Figure No.

Project No. 241.032578.00001

2





Aerial Photography from Bing

- Facility with MECP Permit (ECA/EASR)
- Class I Light Industry
- Class II Medium Industry
- Class III Heavy Industry

1. Monarch Plastics
2. Mauser Packaging
3. Procor
4. Mancor

True North



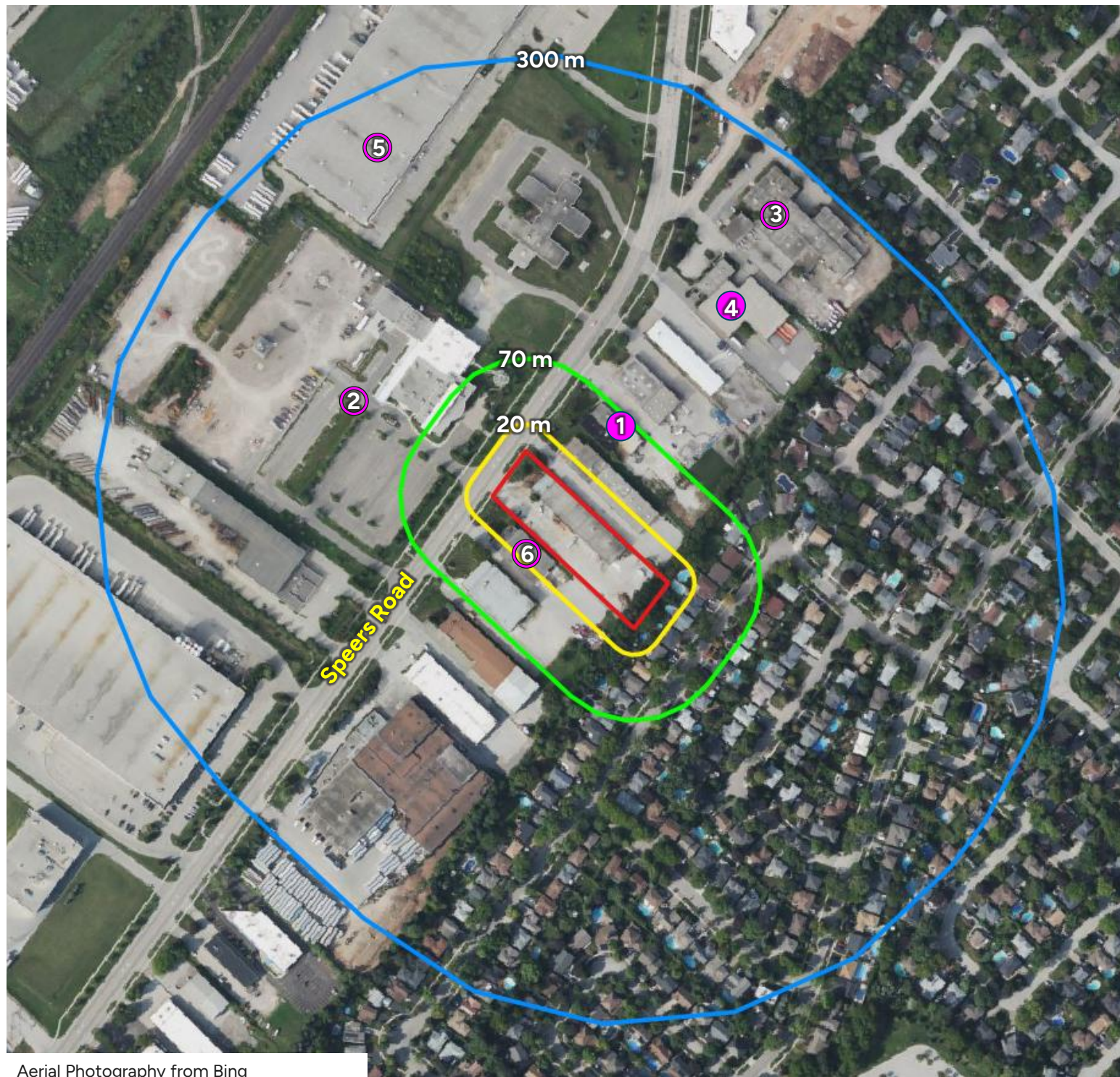
ACCLAIM HEALTH

2250 SPEERS ROAD - OAKVILLE,
ONTARIO

GUIDELINE D-6
RECOMMENDED SEPARATION
DISTANCES TO 1000 METRES

Scale:	1: 10,000	METRES
Date: Aug 10, 2026	Rev 0.0	Figure No.
Project No. 241.032578.00001		3

SLR



Aerial Photography from Bing

- Facility with MECP Permit (ECA/EASR)
- Class I Light Industry
- Class II Medium Industry
- Class III Heavy Industry

1. North American Hard Chrome
2. OE Banquet
3. Acuren/Tacten
4. Oakville Stamping
5. Mohawk Medbuy
6. Jelinek Cork Ltd.

True North



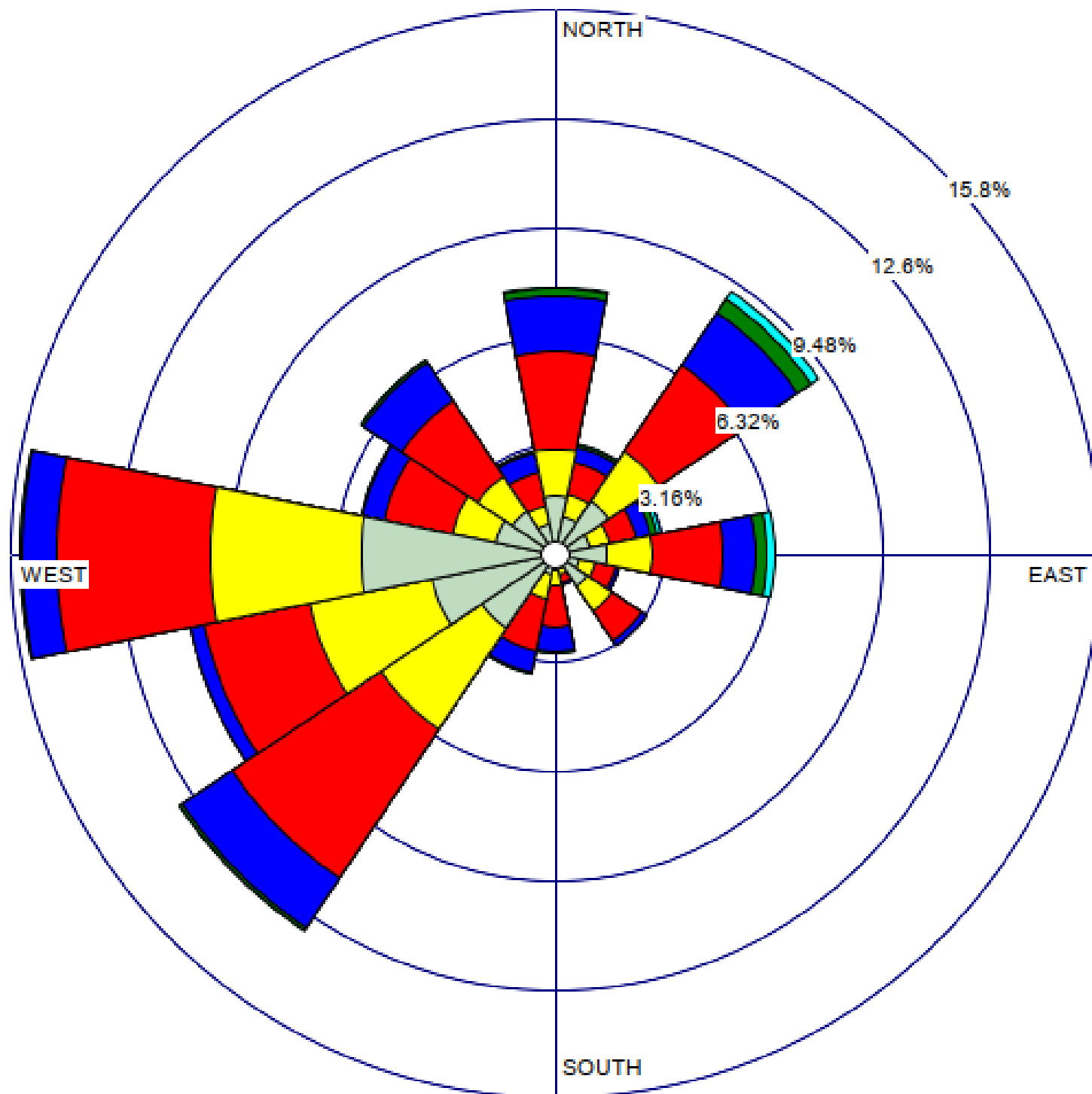
ACCLAIM HEALTH

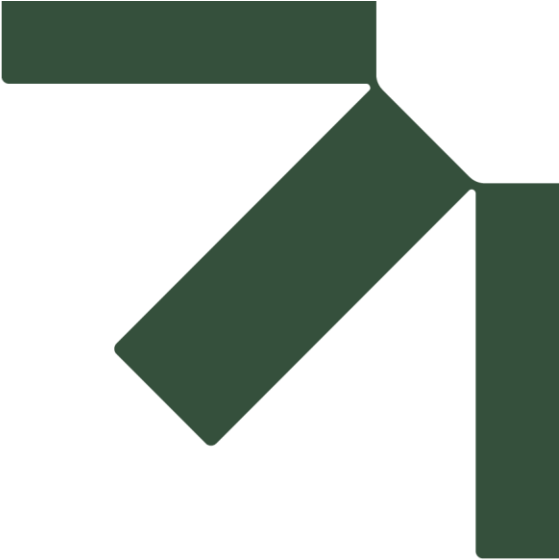
2250 SPEERS ROAD - OAKVILLE,
ONTARIO

GUIDELINE D-6 SEPARATION
DISTANCES TO 300 METRES

Scale:	1: 5,000	METRES
Date: Aug 10, 2026	Rev 0.0	Figure No.
Project No. 241.032578.00001		4

SLR





Attachment B Surrounding Industry List

Land Use Compatibility Consultation

2250 Speers Road, Oakville

Acclaim Health

SLR Project No.: 241.032578.00001

August 10, 2026

Land Uses Surrounding 2250 Speers Road, Oakville

Name	Address	Description	MECP ECA or EASR No.	Class	A of I	R M S	Actual Dist.	Within A of I?	Within R M S?
Vacant Lot (Formerly M&G Steel Holdings)	2285 Speers Rd	Vacant Lot		III	1000	300	110	Yes	Yes
Monarch Plastics	2335 Speers Rd	Plastic Bottle and Container Manufacturing	5805-AHXPHN (2017)	III	1000	300	185	Yes	Yes
North American Hard Chrome	2230 Speers Rd	Hard Chrome Plating	2824-6PARNH (2006)	II	300	70	35	Yes	Yes
OE Banquet & Conference Center, and International Union of Operating Engineers Local 793	2245 Speers Rd	Crane Operator School		I	70	20	25	Yes	-
Vacant Lot (Formerly HPG Inc)	2240 Speers Rd	Vacant Lot		II	300	70	0	Yes	Yes
Jelinek Cork Ltd	2260 Speers Rd	Building Materials Store		I	70	20	0	Yes	Yes
Procor Ltd	2001 Speers Rd	Tanker and Railcar Repair	0745-8DFMXJ	III	1000	300	650	Yes	-
Procor Ltd	2063 Speers Rd	Tanker and railcar repair	R-010-1110624682 (2024)	III	1000	300	650	Yes	-
Mancor Canada	2485 Speers Rd	Metal Component Manufacturing	5864-8TMHJP (2014)	III	1000	300	755	Yes	-
MAUSER Packaging Solutions (ECA under ROPAK)	2240 Wycroft Rd	Packaging	8771-A9DJDC (2016)	II	300	70	410	-	-
Acuren/ Tacten Inc	2180 Speers Rd	Engineering Consultants; Space up for lease		II	300	70	210	Yes	-
2135967 Ontario Limited (Medbuy)	2189 Speers Rd	Healthcare Distribution Centre	1498-7GDP43 (2008)	II	300	70	165	Yes	-
Oakville Stamping & Bending	2200 Speers Rd	Manufacturer and Distributor of Plumbing Products	4080-9EJLQJ (2013)	II	300	70	160	Yes	-
Office Space	2201 Speers Rd			I	70	20	55	Yes	-
Robertson Electric Wholesale	2220 Speers Rd	Retail		I	70	20	35	Yes	-
The Dugout	2270 Speers Rd	Baseball Indoor Training		I	70	20	33	Yes	-
Oakville Sheet Metal Co	2060 Speers Rd	Plasma and Flame Cutting, Welding		II	300	70	740	-	-



Land Uses Surrounding 2250 Speers Road, Oakville

Name	Address	Description	MECP ECA or EASR No.	Class	A of I	R M S	Actual Dist.	Within A of I?	Within R M S?
Opti Distribution	2102 Speers Rd	Car wheel wholesaler		II	300	70	570	-	-
Canadian Bron	2120 Speers Rd	Machining Manufacturer		II	300	70	510	-	-
Canadian Bron	586 Third Line	Machine Manufacturing		II	300	70	540	-	-
ATD Contracting Services	2170 Speers Rd	General Contractor and Granite Stonework LTD		II	300	70	310	-	-
Fruition Manufacturing Ltd	2379 Speers Rd	Fruit Filling Manufacturer		II	300	70	400	-	-
T. D. Smith Transport	2393 Speers Rd	Transportation service		II	300	70	520	-	-
Bunge	2190 S Service Rd	Feed Manufacturer	0135-7EENKF	II	300	70	740	-	-
All Connect Logistical Services	2070 Wyecroft Rd	Freight forwarding		II	300	70	740	-	-
MetriCan Manufacturing Co	2100 Wyecroft Rd	Tooling and stamping metal		II	300	70	740	-	-
Bronte GO	2104 Wyecroft Rd	Transit Hub		II	300	70	420	-	-
Laydon Composites	2109 Wyecroft Rd	Semi-truck Trailer Parts Manufacturer	7769-AFXJHV	II	300	70	870	-	-
Multiple Tenants	2172 Wyecroft Rd	Multiple Small Commercial Tenants	R-010-8111335038	II	300	70	522	-	-
New West Gypsum Recycling	2182 Wyecroft Rd	Gypsum Recycling Centre	A210424	II	300	70	522	-	-
El-con Construction	2231 Wyecroft Rd	Construction Equipment Storage		II	300	70	683	-	-
Caravan Logistics Inc.	2284 Wyecroft Rd	Trucking Company Storage and Maintenance Yard	0399-674Q68	II	300	70	400	-	-
NCI Canada Inc	2305 Wyecroft Rd	Pipe and valve distributor		II	300	70	670	-	-
West Side	2050 Speers Rd	Automotive paint/ refinishing	R-001-4659367111	I	70	20	740	-	-



Land Uses Surrounding 2250 Speers Road, Oakville

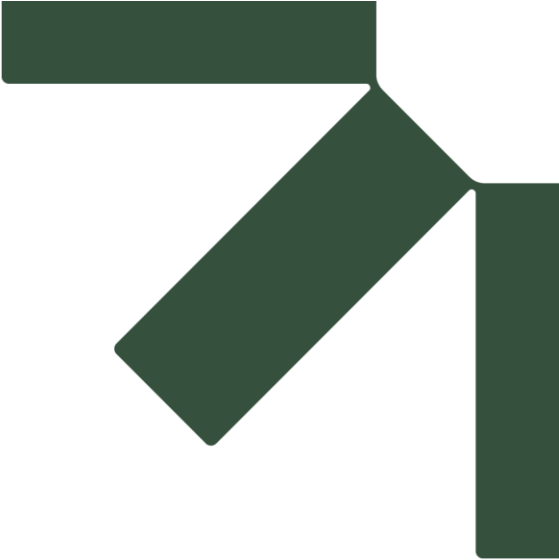
Name	Address	Description	MECP ECA or EASR No.	Class	A of I	R M S	Actual Dist.	Within A of I?	Within R M S?
Trends Wood Finishing	2050 Speers Rd	Kitchen Cabinet Refinishing	9167-ADKQBF	I	70	20	740	-	-
Multiple Tenants	2070 Speers Rd	All-in-one Wood Tools, Atex Printing and Graphics, Star Auto Glass		I	70	20	690	-	-
North Star Electric	2076 Speers Rd	Electricians and Smart Board Supplier		I	70	20	650	-	-
Meraki	2080 Speers Rd	Sports And Fitness Center		I	70	20	650	-	-
Lakeshore Carpet Cleaners	2084 Speers Rd	Carper cleaning service		I	70	20	650	-	-
Appleby Systems	2086 Speers Rd	HVAC Contractor		I	70	20	631	-	-
City Tire	2092 Speers Rd	Used Tire Sales		I	70	20	600	-	-
Mister Mechanic	2110 Speers Rd	Forklift dealer		I	70	20	510	-	-
Florence Meats	2136 Speers Rd	Butcher		I	70	20	475	-	-
Roof Lines East Inc	2140 Speers Rd	Landscapeing Contractor		I	70	20	400	-	-
Multiple Tenants	2210 Speers Rd	Live and Dance Studio, Pressure Clean Pools		I	70	20	120	-	-
Corbetts Head Office	2278 Speers Rd	Corporate office for sports gear retailer		I	70	20	75	-	-
Signs Alive Inc	2284 Speers Rd	Sign Shop		I	70	20	100	-	-
Total Lifting Solutions	2300 Speers Rd	Heavy Duty Lifting Equipment	9026-5HLLZC	I	70	20	110	-	-
Acclaim Health	2370 Speers Rd	Dementia Care, nursing, social support, hospice and pallative care		I	70	20	340	-	-
Proliner Utility Products	2374 Speers Rd	Retail, Safety Equipment		I	70	20	384	-	-
Advance laser and Fabrication inc	2380 Speers Rd	laser and fabrication		I	70	20	410	-	-
Vacant	2384 Speers Rd	vacant building		I	70	20	440	-	-



Land Uses Surrounding 2250 Speers Road, Oakville

Name	Address	Description	MECP ECA or EASR No.	Class	A of I	R M S	Actual Dist.	Within A of I?	Within R M S?
Condor Signal and Communications	2388 Speers Rd	Signal Product Distributor		I	70	20	475	-	-
Glenwood Laboratories Canada LTD.	2392 Speers Rd	Pharmaceutical products wholesaler		I	70	20	500	-	-
Murron Cabinets	2402 Speers Rd	Cabinet Manufacturer	9722-7YMS38	I	70	20	600	-	-
Canada Post	2428 Speers Rd	Distribution Center		I	70	20	660	-	-
Element Materials Technology	2475 Speers Rd	Laboratory	R-010-1117589359	I	70	20	650	-	-
Team Industrial Services	781 Westgate Rd	General Contractor		I	70	20	770	-	-
Howard Graphic Equipment	800 Westgate Rd	Printing, Packaging, and Bindery Equipment Sales	1092-AFKKD4	I	70	20	850	-	-
Wallace and Carey Inc (7-11)	2226 S Service Rd	Distribution Service		I	70	20	840	-	-
TD Insurance Auto Centre	2474 S Service Rd	Automotive repair	5954-7U5M9B	I	70	20	885	-	-
UMH	2130 S Service Rd	Warehouse	A-500-3255029032	I	70	20	950	-	-





Attachment C 2019 Air Quality and Land Use Compatibility Report

Land Use Compatibility Consultation

2250 Speers Road, Oakville

Acclaim Health

SLR Project No.: 241.032578.00001

August 10, 2026





2250 Speers Road Air Quality Study – Land Use Compatibility Oakville, ON

Novus Reference No. 18-0395

Version No. 1.2

May 10th, 2019

NOVUS PROJECT TEAM:

Air Quality Scientist:	Laura Clark, B.Eng., EIT
Air Quality Specialist:	Nigel Taylor, M.Sc., EP
Project Manager:	Aaron Haniff, P.Eng.

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Table of Contents

1.0	Introduction	1
2.0	Description of Development and Surrounding Area.....	1
2.1	Proposed Development.....	1
2.2	Zoning	2
2.3	Nearby Industries	3
3.0	Applicable Air Quality Related Planning Policy and Guidelines	3
3.1	Halton Region’s Regional Official Plan Guidelines: Land Use Compatibility Guidelines	3
4.0	Classification of Nearby Industries.....	6
4.1.1	Class I – Light Industrial Uses	12
4.1.2	Class II – Medium Industrial Uses	12
4.1.3	Class III – Heavy Industrial Uses.....	12
5.0	Provincial Guidelines and Regulations for Potentially Incompatible Uses	13
5.1	Air Quality Contaminants	13
5.2	Odour.....	13
5.3	Halton Region Air Quality Guidelines.....	14
6.0	Air Quality Impact Assessment	14
6.1	Class I Industry Air Quality Impacts.....	14
6.2	Class II Industry Air Quality Impacts	15
6.2.1	Acuren / Tacten Inc.	15
6.2.2	2135967 Ontario Ltd.	15
6.2.3	Oakville Stamping and Bending.....	16
6.2.4	North American Hard Chrome	16
6.3	Class III Industry Air Quality Impacts	16
6.3.1	Procor Ltd.....	16
6.3.2	M&G Steel Holdings.....	17
6.3.3	Monarch Plastics Ltd.....	17
6.3.4	Praxair Canada	17
6.3.5	Mancor Canada.....	18
6.3.6	Ropak Canada.....	18
6.3.1	Caravan Logistics Inc.....	18
7.0	Conclusions	19

List of Tables

Table 1: MECP's Land Use Compatibility Setback Distances and Areas of Influence	4
Table 2: MECP's Land Use Compatibility Guideline D-Series Classifications.....	5
Table 3: Categorization of Industries / Commercial Uses Near 2250 Speers Road	7

List of Figures

Figure 1: Proposed Development Context Plan.....	2
Figure 2: Town of Oakville Zoning Map with Subject Lands Indicated by a Yellow Outline.....	2
Figure 3: Area of Influence Distances from the 2250 Speers Road Development Site.....	6
Figure 4: Industrial Identification within a 1km Radius of 2250 Speers Road	11

1.0 Introduction

Novus Environmental Inc. (Novus) was retained by PGL Environmental Consultants to perform a land use compatibility study in the context of air quality for the 2250 Speers Road (the Site), in Oakville, Ontario. The development plan, surrounding industrial activities and provincial regulations and guidelines have all been considered in this assessment. This report is meant to support planning submissions and a zoning by-law amendment (ZBA) application for the proposed development on the subject lands.

The following regulations and guidelines have been considered in this assessment:

- Halton Regional Official Plan Guidelines – Land Use Compatibility Guidelines (LUCG)
- Halton Regional Official Plan Guidelines – Air Quality Guidelines
- Ministry of Environment, Conservation and Parks (“MECP”) Guideline D-6, Compatibility Between Industrial Facilities And Sensitive Land Uses
- Ontario Regulation 419/05 – Air Quality

2.0 Description of Development and Surrounding Area

2.1 Proposed Development

The Site is located at 2250 Speers Road between Third Line and Bronte Road, in Oakville, Ontario. The subject lands cover a lot area of approximately 1.46 acres and will include an Acclaim Health facility. The Site is to be used as a dementia care centre with adult day programming, support classrooms / meetings room, and a short-term caregiver relief programs involving eight (8) overnight respite rooms. The proposed design of the facility is a one-storey building and therefore, will not introduce elevated receptors to the area. The current context plan is shown in **Figure 1**.

Surrounding the proposed development are commercial and industrial properties to the east and south. Directly surrounding the proposed development exists a mix of commercial space and industrial uses, with a large residential area south of Speers Road. North of Speers Road is a heavily industrial area.

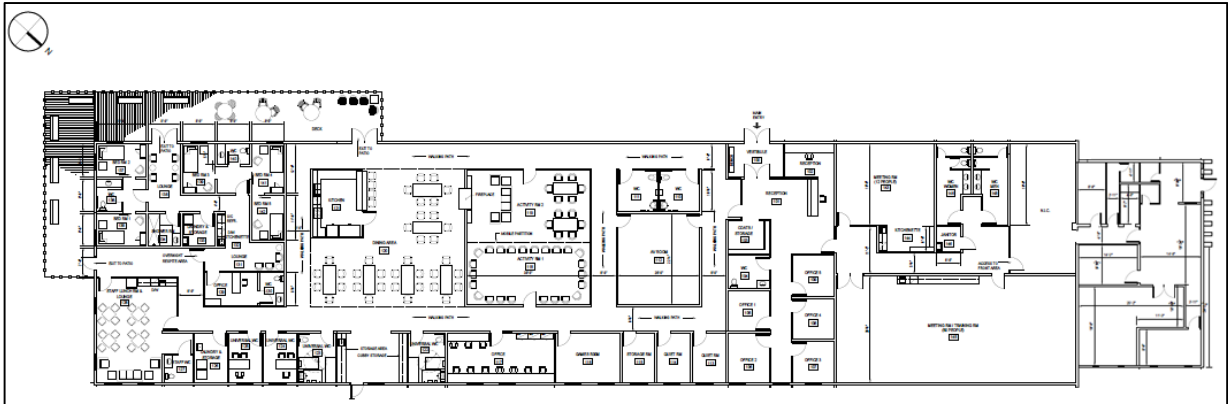


Figure 1: Proposed Development Context Plan

2.2 Zoning

The Town of Oakville Zoning by-law 2014-014 currently zones the site as ‘Office Employment’ (zone code: E1) and is described on map ‘19 (5)’. The current zoning designation permits the use of adult care and daycare uses, however the re-zoning application is to permit the use of overnight respite care at the Site. **Figure 2** below shows the zoning map of the surrounding area the development site.

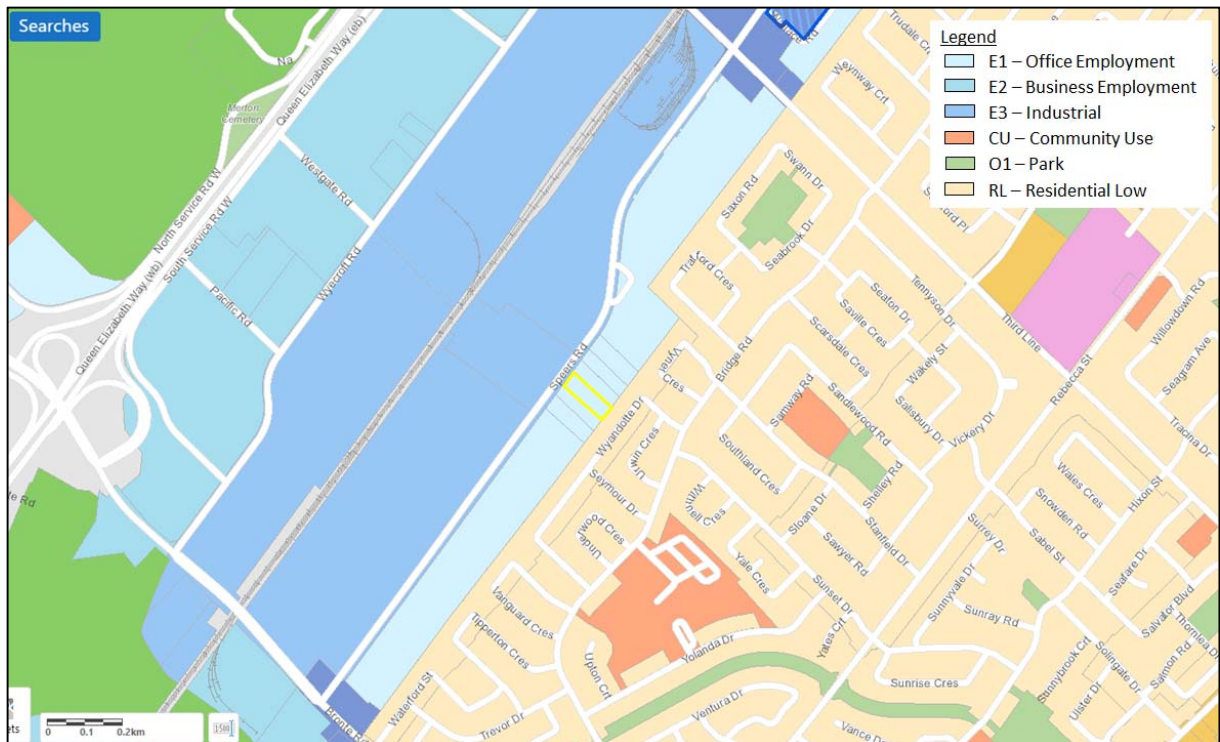


Figure 2: Town of Oakville Zoning Map with Subject Lands Indicated by a Yellow Outline

2.3 Nearby Industries

The area surrounding the proposed development site is a mix of residential, commercial and industrial properties. Industrial facilities of interest from an air quality perspective considered in this assessment are listed in **Table 3**. These industries are located within the 1,000 m area of influence. They include various autobody repair shops, manufacturing plants, distribution centres, and packaging facilities. It should be noted that an Acclaim Health senior and dementia care facility was located at 2370 Speers Road from 1992 to 2002.

This assessment focuses on the industries that are located within the area of influence of the 2250 Speers Road development, for their respective classification of the individual industry. Several industries are located outside the area of influence and, therefore, are considered to be compatible. There are several existing industries surrounding the development site which have Environmental Compliance Approvals (ECA) or are registered on the Environmental Activity and Sector Registry (EASR), which are taken into consideration within the context of this report.

3.0 Applicable Air Quality Related Planning Policy and Guidelines

3.1 Halton Region's Regional Official Plan Guidelines: Land Use Compatibility Guidelines

The purpose of Land Use Compatibility Guidelines development by the Region (LUCG) is to “identify how land use compatibility issues may be addressed by municipalities during a development proposal...” The LUCG were developed by the Region in consideration of the Provincial D-Series of Guidelines, prepared by the MECP in 1995 for planning guidance in evaluating land use compatibility. Section 2 of the LUCG identifies the relevant provincial guidelines and regulations which are to be considered in conducting air quality assessment in Ontario:

“The D-Series are used for development applications that require the re-designation (Official Plan Amendment) or rezoning of land uses (Zoning By-law amendment). The MECP’s D-Series are only applicable when a:

- New sensitive land use requires a land use amendment and is proposed to be located within the influence, or potential influence, area of an impacting use, such as an existing industrial land use; or when a*
- New industrial use requires a land use amendment and is proposed to be located near an existing sensitive residential use.”*

Included in the Region’s summary is a discussion of the “potential areas of influence” approach, as presented in the D-series of guidelines when assessing compatibility of industrial uses with more sensitive uses such as residences.

In preparing the LUCG, the Region has clarified an aspect concerning recommended minimum separation distances. In the LUCG, it is understood that areas of influence of various industrial processes will be site specific. Actual areas of influence are determined through appropriate studies allowing for industrial activities to be compatible with more sensitive land uses within the area of influence and within recommended minimum separation distances which are presented in **Table 1**. Appropriate studies can provide mitigation strategies, if required.

Table 1: MECP's Land Use Compatibility Setback Distances and Areas of Influence

Ministry of Environment: D-Series – INDUSTRIAL USES		
Potential Areas of Influence and Minimum separation Distances*		
Industrial Facility	Potential Area of Influence (metres)	Minimum Separation Distance (metres)
Class I	70	20
Class II	300	70
Class III	1000	300

¹

A summary of the D-6 Industrial Categorization criteria considered in the LUCG is listed in **Table 2**. It is worth noting that the Region has made minor alterations to the table from what appears in the D-6 guidance.

¹ Halton Regional Official Plan Guidelines – Land Use Compatibility Guidelines
(www.halton.ca/common/pages/UserFile.aspx?fileId=121105, accessed January, 2015)

Table 2: MECP's Land Use Compatibility Guideline D-Series Classifications

Ministry of Environment: D-Series' Industrial Categorization Criteria			
Item	Class 1	Class 2	Class 3
Noise	• Sound not audible off property	• Sound occasionally audible off property	• Sound frequently audible off property
Dust and /or Odour	• Infrequent and not intense	• Frequent and occasionally intense	• Persistent and/or intense
Vibration	• No ground-borne vibration on plant property	• Possible ground-borne vibration, but cannot be perceived off property	• Ground-borne vibration can frequently be perceived off property
Air Quality	• Low probability of fugitive emissions	• Occasional outputs of either point source or fugitive emissions	• High probability of fugitive emissions
Scale of Production	• Small scale plant or scale is irrelevant in relation to all other criteria for this Class	• Medium level of production allowed	• Large production levels
Outside Storage	• Minimal storage	• Outside storage permitted	• Outside storage of raw and finished products
Process	• Self-contained plant or building	• Open process – outdoor storage of wastes or materials	• Open process – outdoor storage of wastes or materials
Process Outputs	• Produces/stores a packaged product	• Periodic outputs of minor annoyance	• Frequent outputs of major annoyances
Possibility of Fugitive Emissions	• Low probability of fugitive emissions	• Low probability of fugitive emissions	• High probability of fugitive emission
Hours of Operation	• Daytime operations only	• Shift operations permitted	• Daily shift operations permitted
On-site Movement	• Infrequent movement of products and/or heavy trucks	• Frequent movement of products and/or heavy trucks with the majority of movements during daytime hours	• Continuous movement of products and employees
Examples (not comprehensive)	• Electronics manufacturing and repair • Furniture repair and refinishing • Beverages bottling • Auto parts supply • Packaging and crafting services • Distribution of dairy products • Laundry and linen supply	• Magazine printing • Paint spray booths • Metal command • Electrical production manufacturing • Manufacturing of dairy products • Dry cleaning services • Feed packing plant	• Manufacturing of paint and varnish • Organic chemicals manufacturing • Breweries • Solvent recovery plants • Soaps and detergent manufacturing • Manufacturing of resins and costing • Metal manufacturing

2

² Halton Regional Official Plan Guidelines – Land Use Compatibility Guidelines
(www.halton.ca/common/pages/UserFile.aspx?fileId=121105, accessed January, 2015)

4.0 Classification of Nearby Industries

The industries within a 1,000m proximity of the proposed development are a mixture of Class I, II, and III facilities. There are multiple commercial and industrial land uses surrounding the proposed residential development. **Figure 3** provides the Guideline D-6 area of influences from the 2250 Speers Road property line. The facilities identified within the 1,000m area of influence surrounding the site are listed in **Table 3** and have included some commercial operations as a conservative measure.



Figure 3: Area of Influence Distances from the 2250 Speers Road Development Site

Table 3: Categorization of Industries / Commercial Uses Near 2250 Speers Road

# on Figure 4	Address	Name	Type / Description	ECA/CofA/EASR [1]	D-6 Classification	Within Aofl? ^[2]	Within Setback ^[3] ?
1	2001 Speers Rd	Procor Ltd	Tanker and Railcar Repair	0745-8DFMXJ	3	Yes	No
2	2030 Speers Rd	Willpak Industries	Car Part Manufacturer	4735-6RKLBM	2	No	No
3	2050 Speers Rd	Trends Wood Finishing	Kitchen Cabinet Refinishing	9167-ADKQBF	2	No	No
	2060 Speers Rd	Oakville Sheet Metal Co	Plasma and Flame Cutting, Welding		2	No	No
4	2063 Speers Rd	Procor Ltd	Tanker and railcar repair	R-010-1110624682	3	Yes	No
	2070 Speers Rd	Multiple Tenants	All-in-one Wood Tools, Atex Printing and Graphics, Star Auto Glass		2	No	No
	2076 Speers Rd	North Star Electric	Electricians and Smart Board Supplier		1	No	No
	2080 Speers Rd	Meraki	Sports And Fitness Center		1	No	No
	2084 Speers Rd	Lakeshore Carpet Cleaners			1	No	No
	2086 Speers Rd	Appleby Systems	HVAC Contractor		1	No	No
	2092 Speers Rd	City Tire	Used Tire Sales		1	No	No
	2102 Speers Rd	Top Notch Cabinets	Cabinet Manufacturer		2	No	No
	2110 Speers Rd	Wrought Iron Art	Iron Works		1	No	No
	2120 Speers Rd	Canadian Bron	Machining Manufacturer		2	No	No
	2136 Speers Rd	Florence Meats	Butcher		1	No	No
	2140 Speers Rd	Roof Lines East Inc	Roofing Contractor		1	No	No
	2170 Speers Rd	ATD Contracting Services	General Contractor and Granite Stonework LTD		2	No	No
5	2180 Speers Rd	Acuren/ Tacten Inc	Engineering Consultants; Space up for lease		2	Yes	No
6	2189 Speers Rd	2135967 Ontario Limited	Plexus Distribution Centre	1498-7GDP43	2	Yes	No
	2190 Speers Rd	Acuren/ Tacten Inc	Engineering Consultants		1	No	No
7	2200 Speers Rd	Oakville Stamping & Bending	Manufacturer and Distributor of Plumbing Products	4080-9EJLQJ	2	Yes	No
	2201 Speers Rd	Vacant Office Space			1	No	No
	2210 Speers Rd	Multiple Tenants	Live and Dance Studio, Pressure Clean Pools		1	No	No
	2220 Speers Rd	Robertson Electric Wholesale	Retail		1	No	No
8	2230 Speers Rd	North American Hard Chrome	Hard Chrome Plating	2824-6PARNH	2	Yes	Yes
9	2240 Speers Rd	HPG Inc	Precision Machining		1	Yes	Yes
10	2245 Speers Rd	OE Banquet & Conference Center, and International Union of Operating Engineers Local 793	Crane Operator School		1	Yes	No
11	2260 Speers Rd	Jelinek Cork Ltd	Building Materials Store		1	Yes	Yes
12	2270 Speers Rd	The Dugout	Baseball Indoor Training		1	Yes	No
	2278 Speers Rd	Action Sports Outlet	Retail		1	No	No
	2284 Speers Rd	Signs Alive Inc	Sign Shop		1	No	No
13	2285 Speers Rd	M&G Steel Holdings	Steel Processing	7691-A6BN7R	3	Yes	Yes
	2300 Speers Rd	Total Lifting Solutions	Heavy Duty Lifting Equipment	9026-5HLLZC	1	No	No

14	2335 Speers Rd	Monarch Plastics	Plastic Bottle and Container Manufacturing	5805-AHXPHN	3	Yes	Partial
	2370 Speers Rd	Acclaim Health	Dementia Care, nursing, social support, hospice and pallative care		1		
	2374 Speers Rd	Proliner Utility Products	Retail, Safety Equipment		1	No	No
	2379 Speers Rd	Fruition Manufacturing Ltd	Fruit Filling Manufacturer		2	No	No
	2380 Speers Rd	Courage Distributing inc	Distributor of Automotive Accessories		1	No	No
	2384 Speers Rd	Bigelow-Iptak of Canada	Head Office		1	No	No
	2388 Speers Rd	Condor Signal and Communications	Signal Product Distributor		1	No	No
	2392 Speers Rd	Tahl Products Ltd	Retail, Arts and Crafts		1	No	No
15	2393 Speers Rd	Praxair Canada	Industrial Gas Supply and Equipment	9910-A4JK7X	3	Yes	No
16	2402 Speers Rd	Murron Cabinets	Cabinet Manufacturer	9722-7YMS38	2	No	No
	2410 Speers Rd	Special Interest Cars	Auto Parts Store		1	No	No
	2428 Speers Rd	Canada Post	Distribution Center		1	No	No
17	2485 Speers Rd	Mancor Canada	Metal Component Manufacturing	5864-8TMHJP	3	Yes	No
	781 Westgate Rd	Team Industrial Services	General Contractor		1	No	No
18	800 Westgate Rd	Howard Graphic Equipment	Printing, Packaging, and Bindery Equipment Sales	1092-AFKKD4	2	No	No
	2190 S Service Rd	Bunge Canada	Feed Manufacturer	9272-6UHRYQ	2	No	No
	226 S Service Rd	Wallace and Carey Inc	Distribution Service		1	No	No
	2070 Wyecroft Rd	All Connect Logistical Services	Freight forwarding		2	No	No
	2100 Wyecroft Rd	MetriCan Manufacturing Co	Tooling and stamping metal		2	No	No
	2104 Wyecroft Rd	Bronte GO	Transit Hub		2	No	No
19	2109 Wyecroft Rd	Laydon Composites	Semi-truck Trailer Parts Manufacturer	7769-AFXJHV	2	No	No
	2125 Wyecroft Rd	CPM Centres for Pain Management	Health Care		1	No	No
	2139 Wyecroft Rd	Vacant Industrial Space	Industrial Space		2	No	No
20	2172 Wyecroft Rd	Multiple Tenants	Multiple Small Commercial Tenants		2	No	No
	2182 Wyecroft Rd	New West Gypsum Recycling	Gypsum Recycling Centre		2	No	No
21	2192 Wyecroft Rd	Kencro Chemicals	Chemical Distribution	1017-A3QJX8	2	No	No
	2195 Wyecroft Rd	Smart Little Children	Daycare		1	No	No
22	2212 Wyecroft Rd	Auto Collision Carstar	Autnomobile Repair	5730-52PMPH	2	No	No
	2219 Wyecroft Rd	CRS Oakville	Car Repair		1	No	No
	2231 Wyecroft Rd	El-con Construction	Construction Equipment Storage		2	No	No
23	2240 Wyecroft Rd	Ropak Canada	Packaging	8771-A9DJDC	3	Yes	No
	2245 Wyecroft Rd	Unique Off-Grid Appliances	Appliance Store		1	No	No
24	2284 Wyecroft Rd	Caravan Logistics Inc.	Trucking Company Storage and Maintenance Yard	0399-674Q68	3	Yes	No
	2285 Wyecroft Rd	Direct Response Media Group	Direct Mail Advertising		1	No	No
	2305 Wyecroft Rd	NCI Canada Inc	Pipe and valve distributor		2	No	No
25	2338 Wyecroft Rd	DV Kitchens	2334 to 2416 Wyecroft Road; Multiple Small Commercial Tenants	R-010-5110601920	1	No	No
25	2342 Wyecroft Rd	The Paragon Innovation Group	Prop Manufacturer and Set Design	R-010-7110111792	1	No	No

2250 Speers Road, Air Quality Land Use Compatibility Study
May 10, 2019

25	2333 Wyecroft Rd	Multiple Tenants	Small Commercial		1	No	No
25	2345 Wyecroft Rd	Multiple Tenants	Small Commercial		1	No	No
25	2375 Wyecroft Rd	Oakville Toyota	Car Dealership		1	No	No
25	2390 Wyecroft Rd	Polymark Manufacturing	Polyurethane Parts Manufacturer	2691-9D6LGR	1	No	No
25	2400 Wyecroft Rd	Promotional Source Corp	Advertising and Promotional Products	R-005-1110135677	1	No	No
25	2400 Wyecroft Rd	JD Tinning	Tin and Copper Products	6193-7TBK7V	2	No	No
26	2425 Wyecroft Rd	VSM Abrasives Canada	Abrasive Paper Belt Manufacturer	8480-8R4MB6	2	No	No
	2432 Wyecroft Rd	Multiple Tenants	Multiple Small Commercial Tenants		1	No	No
	2475 Wyecroft Rd	Maserati of Oakville	Car Dealership		1	No	No
	760 Pacific Rd	Multiple Tenants	Multiple Small Commercial Tenants		2	No	No

Note: [1] – ECA = Environmental Compliance Approval; CofA = Certificate of Approval; EASR = Environmental Activity and Sector Registry

[2] – AofI = Area of Influence; Class I (70m), Class II (300m), Class III (1000m)

[3] – Setbacks = Class I (20m), Class II (70m), Class III (300m)

Within Ontario, facilities which emit significant amounts of contaminants to the environment are required to obtain and maintain an environmental approval, such as the Environmental Compliance Approval (an “ECA”, formerly a Certificate of Approval, or “CofA”) from the MECP or submit registration to the Environmental Activity and Sector Registry (“EASR”). As shown in the table, there are twenty-six (26) facilities identified which have ECA’s, CofA’s, or EASR’s from the MECP for their operations. Soft copies of the ECA’s, CofA’s, or EASR’s are available upon request.

The area of influence and recommended minimum setbacks from the nearby industries are shown above in **Figure 3**. Industries identified to be located within an area of influence from the development site based on the respective classifications are shown below in **Figure 4**. The numbering identifying the facilities in **Figure 4** corresponds to the numbering listed in **Table 3**.

The D-6 Guideline recommends that when a development is proposed within an industry’s area of influence or recommended minimum setback distance, an assessment may be performed to determine if compatibility can be achieved. Provided below are preliminary comments and findings with respect to predicted impacts at the proposed development from the identified industrial facilities nearby.



Figure 4: Industrial Identification within a 1km Radius of 2250 Speers Road

4.1.1 Class I – Light Industrial Uses

The Class I light commercial uses identified within the 70 m Potential Area of Influence include:

- HPG Inc, at 2240 Speers Road;
- Jelinek Cork Inc., at 2260 Speers Road;
- The Dugout, at 2270 Speers Road, and
- OE Banquet & Conference Centre, and International Union of Operating Engineers Local 793, at 2245 Speers Road.

All other Class I industries identified are outside of the 70 m Area of Influence and, therefore, and not anticipated to affect the development.

4.1.2 Class II – Medium Industrial Uses

There are four medium scale industrial/ commercial uses within the 300 m potential Area of Influence for Class II industries, namely:

- Acuren / Tacten Inc., at 2180 and 2190 Speers Road;
- 2135967 Ontario Ltd., at 2189 Speers Road;
- Oakville Stamping & Bending, at 2200 Speers Road; and
- North American Hard Chrome, at 2230 Speers Road.

All other Class II industries are outside of the 300 m Area of Influence and, therefore, and not anticipated to affect the development.

A review of the potential impacts from the four facilities listed above is warranted.

4.1.3 Class III – Heavy Industrial Uses

There are six heavy industrial use is located within the 1,000 m Potential Area of Influence for Class III industries, namely:

- Procor Ltd., at 2001 and 2063 Speers Road;
- M&G Steel Holdings, at 2285 Speers Road;
- Monarch Plastics, at 2335 Speers Road;
- Praxair Canada, at 2393 Speers Road;
- Mancor Canada, at 2485 Speers Road; and
- Ropak Canada, at 2240 Wyecroft Road.

An assessment of the potential for noise and air quality impacts from the six industries is

therefore warranted.

5.0 Provincial Guidelines and Regulations for Potentially Incompatible Uses

Where compatibility issues are identified under the D-6 Guideline, the MECP guidelines and regulations used for assessing environmental compliance are considered for assessing land-use compatibility. The following sections describe the regulations and guidelines which are referred to in this assessment.

5.1 Air Quality Contaminants

Under O.Reg. 419/05, a facility is required to meet prescribed standards for air quality contaminants at their property boundary line and any location off-site.

In general, the assessment techniques required by the MECP focus on ground-level concentrations at the property line and beyond. The exceptions to this are elevated locations associated with mid to high-rise residential developments. Elevated locations are only assessed provided there is a point of reception. It is possible that an industry could currently be meeting Provincial limits at ground-level, however, the introduction of a new mid and high-rise development could then result in excesses of the limits at levels higher than 3-storeys. As the Acclaim Health facility will not be taller than one-storey all industry should remain compliant with O.Reg. 419/05.

5.2 Odour

There are a select few compounds that are provincially regulated from an odour perspective; there is no formal regulation with respect to mixed odours.

The MECP has decided to apply odour-based standards to locations “where human activities regularly occur at a time when those activities regularly occur,” which is generally accepted to be places that would be considered sensitive such as residences and public meeting places. Therefore, a new development introduces new sensitive receptors at which odour impacts could potentially occur.

As stated by the Environmental Commissioner of Ontario, impacts from mixed odours produced by industrial facilities are generally only considered and regulated by the MECP in the presence of persistent complaints (ECO 2010).

5.3 Halton Region Air Quality Guidelines

The Halton Region Air Quality Guidelines (“AQG”) were also published under the Regional Official Plan, and intended to identify applicable legislation regulating industrial, transportation and utility source emissions and their adverse effects on sensitive uses. Land use and development patterns that support the use of alternative energy, reduce greenhouse gas emissions, and identify design adaptations for climate change are also highlighted.

Section 2 of the AQG sets out an “application checklist” providing a best-practice approach for applications where sensitive land uses are proposed near industrial sources.

Under Section 2.1, air quality studies may be required when “sensitive land uses (residential, natural heritage)” are proposed:

- Within 30 m of a major arterial roadway or 150 m of a Provincial freeway;
- Are in proximity to an industrial use; or
- Are in proximity to a utility.

As the Acclaim Health Care Site is defined as a private institutional land use in the AQG, it may be considered a “sensitive use”. As such, an air quality study was conducted to address the AQG to the nearby industrial uses. The Acclaim Health Care building is set back from the major roadway ‘Speers Road’ by approximately 31m, and the sensitive uses within the building, including the overnight respite rooms are located in the southern portion of the building, approximately 90m away from Speers Road. The Site is located more than 1,000m away from Highway 403, a Provincial Freeway.

As per the Town of Oakville Zoning By-law 2014-014, section 4.21 states that sensitive uses should be located no closer than 30m from a rail right-of-way. The Acclaim Health Centre building is located approximately 350m away from the railway line, and 500m from the GO Transit Bronte Station.

As the planned separation distance is not within the distance thresholds for major arterial roadways, Provincial freeways or significant rail right-of-ways, no further study was completed with respect to transportation emissions.

6.0 Air Quality Impact Assessment

6.1 Class I Industry Air Quality Impacts

The Class I facility, The Dugout, is an indoor baseball training warehouse. The Dugout is outside of the D-6 recommended setback distance of 20m to the Site and is not a source of air quality concerns. Jelinek Cork and HPG are small one-storey manufacturing and distribution

industries adjacent to the 2250 Speers Road Site. Jelinek Cork produces cork products such as wine stoppers, and cork flooring. HPG designs, manufactures and distributes turbine components. Both industries do not operate under a current ECA. Although these industries may have sources of air quality emissions, their related operation are subject to the Ontario Air quality standards with in Ontario Regulation 419/05 and are required to meet these standards at the respective property lines of the industrial facilities and beyond. Therefore, provided the industries are compliant with MECP regulations, they would be compliant at the Site and would therefore be compatible from an air quality perspective. Both of the sites are paved in the front, side and rear lots, as such, fugitive dust emissions are not expected. All Class I industries within the 70m area of influence were not identified as sources of odourous emissions. As shown in **Table 3**, there are existing residences within a potential 70m area of influence from the identified industries. If there are currently no compatibility issues from an air quality or odour perspective to the existing residences, then the 2250 Speers site should also be compatible.

6.2 Class II Industry Air Quality Impacts

6.2.1 Acuren / Tacten Inc.

Acuren / Tacten Inc. was identified as an engineering consulting company that is largely office space. While the Acuren / Tacten Inc. can conservatively be classified as Class I, the building at 2180 and 2190 Speers Road is listed as up for sale / lease. The permitted uses of the building could be classified as Class II with possible small-scale manufacturing. The office space is within the potential 300m area of influence for a Class II industry but is set well away from the recommended minimum 70 m setback distance. Should a future tenant have sources of air quality contaminants and odour, they would be required to obtain an ECA or to register with EASR, which would then ensure compliance at the property line and beyond. There are also existing residences within closer proximity to the 2180 and 2190 Speers Road property than the 2250 Speers Road Site, and as such there are no compatibility issues identified.

6.2.2 2135967 Ontario Ltd.

The industrial use located at 2189 Speers Road was identified as distribution hub for health care products, called Plexxus. As there is no manufacturing taking place at the facility the only source of air quality concerns would be from the frequent movement of trucks around the facility. The industry also currently operates under an ECA (Number 1498-7GDP43) and lists the only sources of emissions as heating and cooling comfort equipment and standby diesel generator sets, all of which is now exempt from Section 9 of the environmental protection as per O.Reg. 14/17. There are no compatibility concerns from the 2135967 Ontario Inc. industry and the Site.

6.2.3 Oakville Stamping and Bending

Oakville Stamping and Bending manufactures and distributes metallic plumbing products, such as drains, fittings, overflows, and other plumbing accessories. While the Oakville Stamping and Bending industry is within the potential 300m area of influence for a Class II industry, it is set well back from the recommended minimum setback of 70 m. The industry currently operates under ECA (Number 4080-9EJLQJ) and has two natural gas heating hand soldering stations as the sources of air quality emissions. As the industry is registered with the MECP, the operations may be assumed to be compliant under O.Reg. 419/05 at the property line and beyond including the 2250 Speers Road Site. There are also no odour sources of concern identified at the industry.

6.2.4 North American Hard Chrome

North American Hard Chrome is identified as location #8 on **Figure 4**, which is within the 70m setback distance for a Class II industry. However, the industry is currently operating under ECA (Number 2824-6PARNH), which lists the sources as one sand blast room, and chromium electroplating process. Both sources are equipped with environmental controls including a packed bed scrubber and dry filters for the control of particulates. As the industry is registered with the MECP, the operations would be compliant under O.Reg. 419/05 at their property line and beyond including the 2250 Speers Road Site. There are also no odourous sources of concern identified at the industry.

6.3 Class III Industry Air Quality Impacts

6.3.1 Procor Ltd.

Procor Ltd. is a tanker and railcar repair facility, identified as locations #1 and #4 on **Figure 4**. While Procor Ltd. is within the potential 1,000 m area of influence for a Class III industry, it is set well back from the recommended minimum setback of 300 m. The industry currently operates under ECA (Number 4080-9EJLQJ) listed for the 2001 Speers Road address, and under EASR (R-010-1110624682) for the 2063 Speers Road address. Both the ECA and EASR registration indicate that Procor Ltd. is operating under compliance with O.Reg. 419/05 at the property line and beyond for all sources of air quality contaminants emitted from the industry. It is, therefore, compatible with the one-storey 2250 Speers Road facility. While there may be sources of odour from the industry there are existing residences south of Speers Road that are in closer proximity than the 2250 Speers Road Site. If there are currently no concerns from an odour perspective, there should be no concerns at the 2250 Speers Road Site.

6.3.2 M&G Steel Holdings

M&G Steel Holdings is a steel processing facility, identified as location #13 on **Figure 4**. The industry currently operates under ECA (Number 7691-A6BN7R), and lists controlled sources of emissions from welding, painting, and steel cutting processes. The industry is therefore operating under compliance with O.Reg. 419/05 at the property line and beyond for all sources of air quality contaminants emitted from the industry and is compatible with the one-storey 2250 Speers Road facility. While there are no sources of odour identified from the industry there are existing residences south of Speers Road that are in similar proximity to the 2250 Speers Road Site. If there are currently no concerns from an odour perspective, there should be no concerns at the 2250 Speers Road Site.

6.3.3 Monarch Plastics Ltd.

Monarch Plastics Ltd. is a plastic bottle and container facility, identified as location #14 on **Figure 4**. The industry currently operates under ECA (Number 5805-AHXPHN) and lists the main sources of emissions from plastic mixing, blending, injection, and blow moulding, as well as from printing and packaging. The industry is, therefore, operating under compliance with O.Reg. 419/05 at the property line and beyond for all sources of air quality contaminants emitted from the industry and is compatible with the one-storey 2250 Speers Road facility. The ECA also lists the requirements for the Industry to develop procedures to minimize and prevent emissions of fugitive dust and odour. While there are no sources of odour identified from the industry, there are existing residences south of Speers Road that are in similar proximity to the 2250 Speers Road Site. If there are currently no concerns from an odour perspective, there should be no concerns at the 2250 Speers Road Site.

6.3.4 Praxair Canada

Praxair Canada is an industrial gas supply and equipment distribution facility, identified by location #15 on **Figure 4**. The industry currently operates under ECA (Number 9910-A4JK7X) and lists the main sources of emissions from maintenance welding, a cryogenic fume hood, and general garage exhaust. The industry is not expected to be a large source of emissions as the gaseous supply is largely contained. Therefore, as the Industry is operating in compliance with O.Reg. 419/05 at the property line and beyond, it is expected to be compatible with the one-storey 2250 Speers Road facility. While there are no sources of odour identified from the Industry, there are existing residences south of Speers Road that are in similar proximity to the 2250 Speers Road Site. If there are currently no concerns from an odour perspective, there should be no concerns at the 2250 Speers Road Site.

6.3.5 Mancor Canada

Mancor Canada is a metal component and sub-assembly manufacturing facility, identified as location #17 on **Figure 4**. The industry currently operates under ECA (Number 5864-8TMHJP) and lists the main sources as welding, metal cutting, grinding bending and powder coating. The industry is, therefore, operating under compliance with O.Reg. 419/05 at the property line and beyond for all sources of air quality contaminants emitted from the industry and is compatible with the one-storey 2250 Speers Road facility. While Mancor Canada is within the 1,000m potential area of influence for a Class III industry, it is set well back from the recommended minimum setback distance of 300 m. Odour is not expected to be a concern as there are existing residences south of Speers Road that are in closer proximity to the Industry. If there are currently no concerns from an odour perspective, there should be no concerns at the 2250 Speers Road Site.

6.3.6 Ropak Canada

Ropak Canada (a BWAY corporation) is a plastic packaging facility, identified as location #23 on **Figure 4**. The industry currently operates under ECA (Number 8771-A9DJDC) and lists the main sources of emissions from plastic injection moulds, UV printing, as well as from general exhaust and welding. The industry is therefore operating under compliance with O.Reg. 419/05 at the property line and beyond for all sources of air quality contaminants emitted from the industry and is compatible with the one-storey 2250 Speers Road facility. The ECA also lists the requirements for the Industry to develop procedures to minimize and prevent emissions of odour. While Ropak Canada is within the potential 1,000 m area of influence for a Class III industry, it is set well back from the recommended minimum setback of 300 m. Given the requirements to meet O.Reg. 419/05 and significant setback, air quality concerns are not anticipated at the 2250 Speers Road Site.

6.3.1 Caravan Logistics Inc.

Caravan Group of Companies is a transportation company, the operation located at 2284 Wycroft Road is a storage and maintenance yard for the transport vehicles and shipping containers, identified as location #24 on **Figure 4**. A previous trucking company (Trimac Transportation Service Ltd.), listed at this address, operated under ECA (Number 0399-674Q68) and listed the main sources of emissions to be an air stripper and a vacuum extractor used in the maintenance of the transport totes and to strip VOC's from wastewater. Caravan Logistics is registered with the MECP with a Waste Management System Certificate of Approval and is, therefore, aware of the permitting requirements to operate under compliance with O.Reg. 419/05 at the property line and beyond for all sources of air quality contaminants. The majority of the site is paved with a small section of the storage yard left unpaved. While Caravan Logistics is within the potential 1,000m area of influence for a Class III industry, it is

set well back from the recommended minimum setback of 300 m. Given the requirements to meet O.Reg. 419/05 and significant setback, air quality concerns are not anticipated at the 2250 Speers Road Site.

7.0 Conclusions

A review of the existing industries surrounding the 2250 Speers Road Acclaim Health Site with respect to air quality has been performed in accordance with guidance provided in Halton ROP guidelines. There are also health care facilities in a similar proximity to the industries identified as well as existing medium density residences. The overnight respite care rooms are not expected to present any new compatibility concerns for the existing industrial operations. Based on the review of all industries located within a potential 1,000 m area of influence, we do not anticipate air quality impacts at the proposed development from surrounding industry and the proposed land use should be considered compatible.

August 21, 2019

Ms. Melissa Cameron
Acclaim Health
2370 Speers Rd,
Oakville, ON
L6L 5M2

mcameron@acclaimhealth.ca

**Re: Air Quality Study, Land Use Compatibility - 2250 Speers Road
Peer Review Responses
Novus File No. 18-0395**

Dear Melissa,

Novus Environmental Inc. (“Novus”, now part of SLR Consulting (Canada) Ltd.) was retained by PGL Environmental Consultants on behalf of Acclaim Health to complete an air quality land use compatibility study for the proposed 2250 Speers Road dementia care centre in Oakville, Ontario (“the Site”). The results of our study were documented in:

- Novus Report 18-0395, “2250 Speers Road, Air Quality Study – Land Use Compatibility, Oakville, ON”, dated February 12, 2019 (“the Novus Report”).

Halton Region retained Dillon Consulting Ltd. (“Dillon”) to conduct a peer review of the Novus Report. Their comments were provided in the following memorandum:

- Dillon Memorandum from Mr. Hamish Corbett-Hains (Dillon) to Ms. Laurielle Natywary (Halton Region), entitled “2250 Speers Road Air Quality Study Peer Review”, dated June 20, 2019.

This memorandum provides our responses to Dillon’s comments, including our conclusion that there are no anticipated land use compatibility concerns arising from the proposal. For clarity, excerpts from Dillon’s comments are provided in *italics*, with the response immediately following.

Dillion Comment 1

In general, the Report assesses compliance on the basis of Guideline D-6 and Ontario Regulation 419/05 ... This approach does not address the relevant sections of the Provincial Policy Statement...In light of the above, best practice would include consideration of the air quality at the proposed lands including the ambient concentration of selected contaminants in addition to the potential impacts from surrounding industry. At a minimum the Report should comment on the overall air quality- including existing ambient conditions - at the proposed development with respect to Ontario's Ambient Air Quality Criteria.

In the Ontario planning regime, the requirements flow from generic to specific:

- The Provincial Policy Statement (“the PPS”) sets out goals – making sure adjacent land uses are compatible from a health and safety perspective and are appropriately buffered; then
- The Ministry of the Environment, Conservation & Parks (“MECP”) D-series of guidelines, including Guideline D-6 then sets out methods to determine if assessments are required (areas of influence, recommended separation distances, and the need for additional studies); then
- MECP regulations, policies, standards and guidelines then set out the requirements to ensure that adverse effects do not occur.

Thus, the requirements of the PPS are met if the requirements of Guideline D-6 are met; the requirements of Guideline D-6 are met if the applicable MECP regulations and policies are met. As shown in the Novus Report and in the additional information provided in this response, this is the case. Further, the addendum planning letter, prepared by Bousfields, August 2019, also responds to the PPS policies.

The applicable MECP regulations and policies for industrial uses do not require an assessment of cumulative impacts or an assessment of existing ambient background conditions. The inclusion of such information would not change the assessment results. Therefore, a discussion of overall air quality with respect to Ontario’s Ambient Air Quality Criteria, is irrelevant. Regardless, information for the closest, most relevant MECP monitoring station is provided below. The MECP Oakville monitoring station is approximately 8.5 km from the Site. See **Figure 1**.

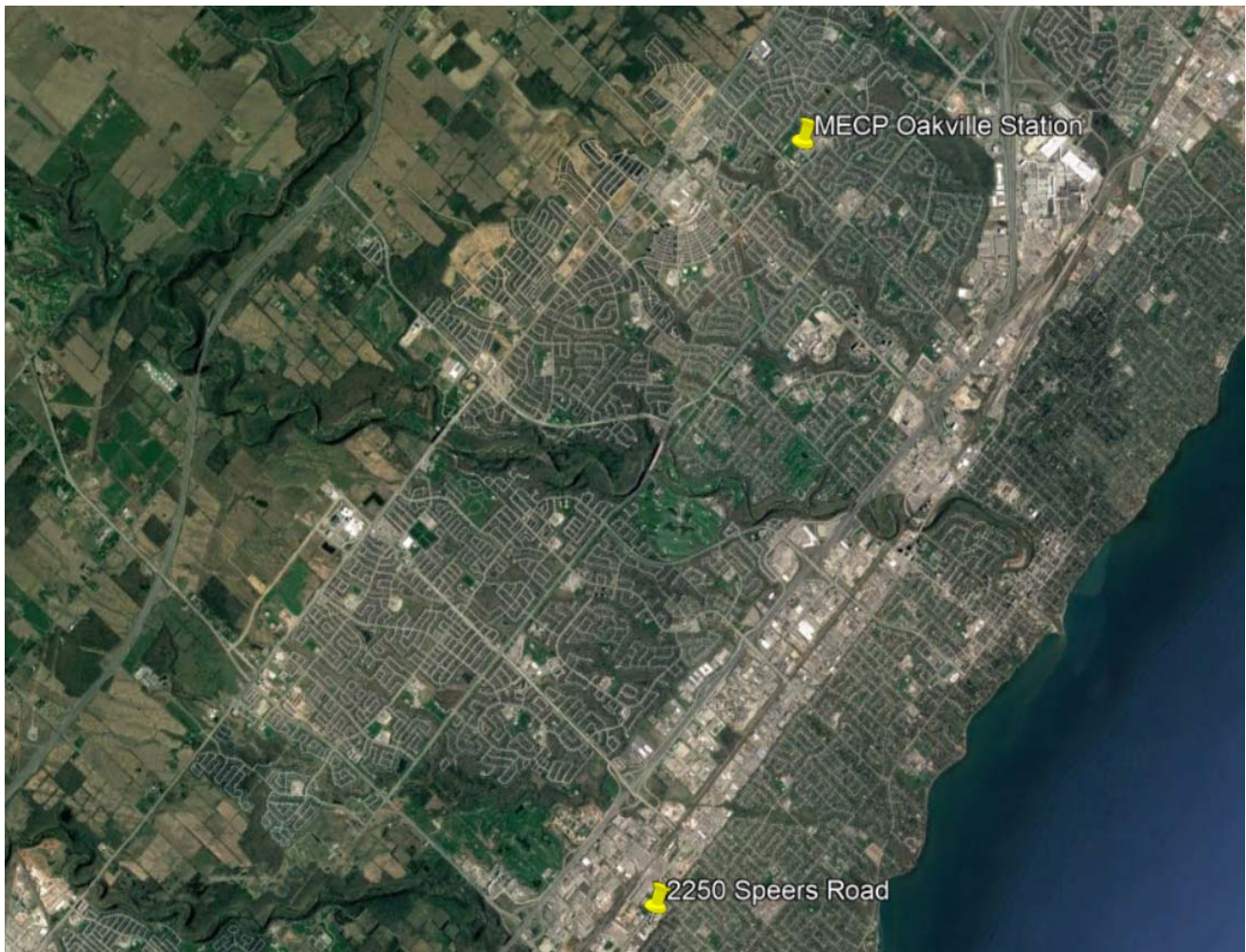


Figure 1: MECP Oakville Ambient Air Quality Monitoring Station and Site

Ambient air quality measurement results are summarized in **Table 1** below, for the contaminants measured at the MECP station (nitrogen dioxide, ozone, and fine particulate matter). As can be seen from the table, the Ambient Air Quality Criteria for these contaminants are met.

Table 1: Measured Ambient Background Concentrations - Oakville

Contaminant	Factor	Measurement Year		
		2015	2016	2017
Nitrogen dioxide NO ₂ - 1hr Avg	AAQC [1]	400.0	400.0	400.0
	Maximum	52.0	50.0	56.0
	Average	7.5	8.3	8.2
	Minimum	0.0	0.0	1.0
Nitrogen dioxide NO ₂ - 24h Avg	AAQC [1]	200.0	200.0	200.0
	Maximum	32.7	28.3	38.0
	Average	7.5	8.3	8.2
	Minimum	0.3	0.5	1.1
Ozone O ₃ - 1hr Avg	AAQC [1]	168.0	168.0	168.0
	Maximum	80.0	74.0	84.0
	Average	27.4	27.1	27.4
	Minimum	0.0	0.0	0.0
Fine Particulate Matter PM _{2.5} -24 hr Avg	CWS [2]	30.0	30.0	30.0
	Maximum	38.0	24.4	24.0
	Average	8.4	7.0	6.9
	Minimum	0.8	0.1	0.8
	98 th percentile	22.9	17.1	17.4
	3-year 98 th percentile		19.8	

Notes:

AAQC - Ambient Air Quality Criteria

CWS – Canada Wide Standard. For fine particulate, the standard is assessed against the 98th percentile concentration measured over a 3 year period.

In this regard, there are no concerns with respect to land use compatibility, compliance with provincial policies, guidelines and regulations.

Dillon Comment 2

The Report does not consider transportation sources associated with any of the industries surrounding the proposed development. Guideline D-6 states that when industries and sensitive land uses are proposed with less than the recommended minimum separation distance, an assessment should be performed which considers "the types and levels of contaminant discharges being generated by current industrial facilities, including those associated with transportation facilities which serve the industries."

In MECP Guideline D-6, it is understood that “contaminant discharges associated with transportation facilities which serve the industries” means those that are generated by vehicle traffic on-site (e.g., shipping and receiving traffic, truck or forklift movements, etc.) The impacts of these sources were considered in our assessment.

MECP Guideline D-6 does not, nor do any of the D-series of guidelines, apply to vehicles operating on publicly owned roadways. The Site is not located within 30 m of a major arterial roadway or 150 m of a Provincial freeway. Therefore, under the Halton Region Air Quality Guidelines an assessment of

transportation air quality impacts is not required.

Therefore, transportation sources, based on the applicable requirements, were in fact considered, and the analysis indicates that transportation sources associated with the current industrial facilities would not impact the proposed use of the site.

Dillon Comment 3

Many of the findings in the Report are based on a comparative assessment of odours, which relies on an absence of odour complaints at existing receptors. It is unclear if Novus submitted Freedom of Information (FOI) requests to support the claim that there are not currently issues with respect to odours from the industries assessed.

An FOI request was not filed because there were no identified concerns from an odour perspective based on Novus' reviews. Acclaim Health currently operates an office and medical nursing clinic at 2370 Speers Road, which is 350 m away from the Site. There have been no air quality, odour, dust or noise complaints from staff or patrons at this location. Novus had contacted Mr. Trevor Machmar, the local MECP District Officer responsible for the area in questions. He indicated that there have been no complaints in the area related to air quality, dust, odour or noise received in the last 3 years.

A site visit was conducted on August 8, 2019 by two Novus personnel to identify the presence of odors and to measure odour intensities. Weather conditions during the visit (10:00am to 12:00pm) were:

- Sunny with a temperature of 23°C and
- 20 km/hr westerly winds with gusts up to 30 km/hr.

A "Nasal Ranger" olfactometry measurement device was used to measure odour intensity if consistent odours were detected. Novus personnel walked from the corner of Speers Road and Bronte Road eastward to 2180 Speers Road and back. The dry weather conditions and strong winds that day would be indicative of worst-case potential impacts for fugitive dust. At no point was there any visible airborne dust nor any evidence of dust debris on the roadways from vehicle track movements or on the ground surrounding the Site, confirming that dust impacts are not an issue.

During the visit, odours were detected from Fruition Manufacturing facility ("Fruition") located at 2379 Speers Road. Fruition makes custom fruit-based fillings and toppings. Odours were noted to originate from the rooftop exhaust sources, and detection was highly dependant on the wind. Odours were only detected immediately adjacent and downwind of the plant (up to approximately 150 m away). It should be noted that the Site is located more than 400m from the Fruition plant, and no odours were detected near or on the Site.

Due to the infrequency of detection, a 10-second or longer odour measurement on the Nasal Ranger was unable to be recorded. The odour was also noted to be pleasant and sweet smelling like baked

goods/brownies.

At no point during the remaining time spent along Speers Road were any other odours detected. There were no odours from Monarch Plastics (2335 Speers Road), or M&G Steel (2285 Speers Road) even though regular daily operations/ activities were apparent.

Novus personnel also walked along Wyandotte Drive south/east of Speers Road to determine whether any odours or visible dust would be detected from the industries east of the Site (to account for the westerly wind direction during measurements). No odours or visible dust were detected at any time in this area.

In conclusion, the MECP has indicated that there had been no air quality, dust, odour or noise complaints received in the last 3 years. An FOI request is not required. Novus has completed additional field studies in August 2019 on a day that would have been considered to be indicative of worst-case potential impacts. The results of this additional study indicated that there would be no concerns with respect to odours that should restrict the use of the site as proposed. In this regard, there are no land use compatibility issues anticipated.

Dillon Comment 4

The International Union of Operating Engineers facility located directly across from the proposed development has been identified in the Report as within the Potential Area of Influence as defined by Guideline D-6. The Report does not provide an assessment of the industry to evaluate potential compliance issues. The industry is a training yard for heavy industrial crane operators and is largely unpaved which may result in significant levels of dust. Considering the separation distance and nature of the industry, the potential for fugitive dust impacts from the industry should be considered.

The International Union of Operating Engineers facility is a training facility (an institutional use) rather than a heavy industry or commercial facility. Thus, there are not significant amounts of traffic to and from the site which would generate dust. The facility is also well outside the minimum separation distance recommended for these types of operations.

A review of historical aerial photographs of the area shows negligible “track-out” of dust / mud from the unpaved area onto the paved section of the site, which is indicative of low dust generation. During our site visits to the area, no visible airborne dust was noted nor was there any evidence of dust from vehicle track movement at the entrance to the facility.

Considering the above, dust impacts from the International Union of Operating Engineers are not anticipated and should not be considered to be a concern with respect to land use compatibility.

Dillon Comment 5

With respect to Class 1 facilities and the proposed development, Section 6.1 of the Report states “If there are currently no compatibility issues from an air quality or odour perspective to the existing

residences, then the 2250 Speers site should also be compatible." The following discussions of odours illustrates that this is an inappropriate conclusion without a detailed assessment to support the finding.

Odour is a nuisance contaminant which the Ministry of the Environment, Conservation and Parks (MECP) only regulates at locations where human activities are likely to occur, excluding commercial and industrial lands.

This is incorrect. The MECP released a Technical Bulletin on odour modeling, entitled *Methodology For Modelling Assessments Of Contaminants With 10-Minute Average Standards And Guidelines Under O. Reg. 419/05* (2008). Odour sensitive receptors are identified as including commercial or institutional facilities.

Proposed Clarification of Human Receptors (MECP Technical Bulletin on Odour, 2008)

Receptor Category	Examples	Exposure Type	Type of Assessment
Permanent potential 24 hour sensitivity	Anywhere someone could sleep including any resident or house, motels, hospitals, senior citizen homes, camp grounds, farmhouse, etc.	Individual likely to receive multiple exposures	Considered sensitive 24 hours per day
Permanent daily hours but with definite periods of shutdown/closure	Schools, daycares, community centres, soccer fields, farmland, churches, bicycle paths, hiking areas, lakes, commercial or institutional facilities (with consideration of hours of operation such as night clubs, restaurants, etc.)	Individual could receive multiple exposures	Night time or daytime exclusion only (consider all other hours)
Seasonal variations with clear restrictions on accessibility during the off season	Golf courses, amusement parks, ski hills, other clearly seasonal private property	Short term potential for exposure	Exclusions allowed for non-seasonal use
Transient	Open fields, roadways, easements, driveways, parking lots, pump houses	Very short term potential for exposure, may not be a single resident exposed to multiple events	Generally would not be included as human receptors unless otherwise specified.

Existing odour-sensitive commercial and institutional uses in the area (Row 3 of the table) include:

- Live to Dance Academy (2210 Speers Road);
- OE Banquet and Conference Centre (2245 Speers Road);
- The Dugout (2270 Speers Road); and
- Acclaim Health Office and Medical Nursing Clinic (2370 Speers Road).

The dispersion of contaminants emitted from an industry- including odour- is dependent on a number of atmospheric and physical factors including: wind speed, wind direction, physical blockages (e.g. buildings), and ground cover. Odours are typically assessed based on frequency and intensity which can be predictive of complaints. Comparing two receptors based on proximity to an odour source does not provide a complete analysis of the potential for odours.

This approach is only valid when the receptors are located in the same downwind direction from a source, in which case the closer receptor would in most cases be expected to experience more frequent and intense odours. In the case of two receptors in different downwind directions from a source, dispersion modelling should be performed to evaluate the frequency and intensity of odours at each receptor.

Figure 2 is a wind frequency distribution diagram ('wind rose') for the area. Dominant winds are from the west through southwest.

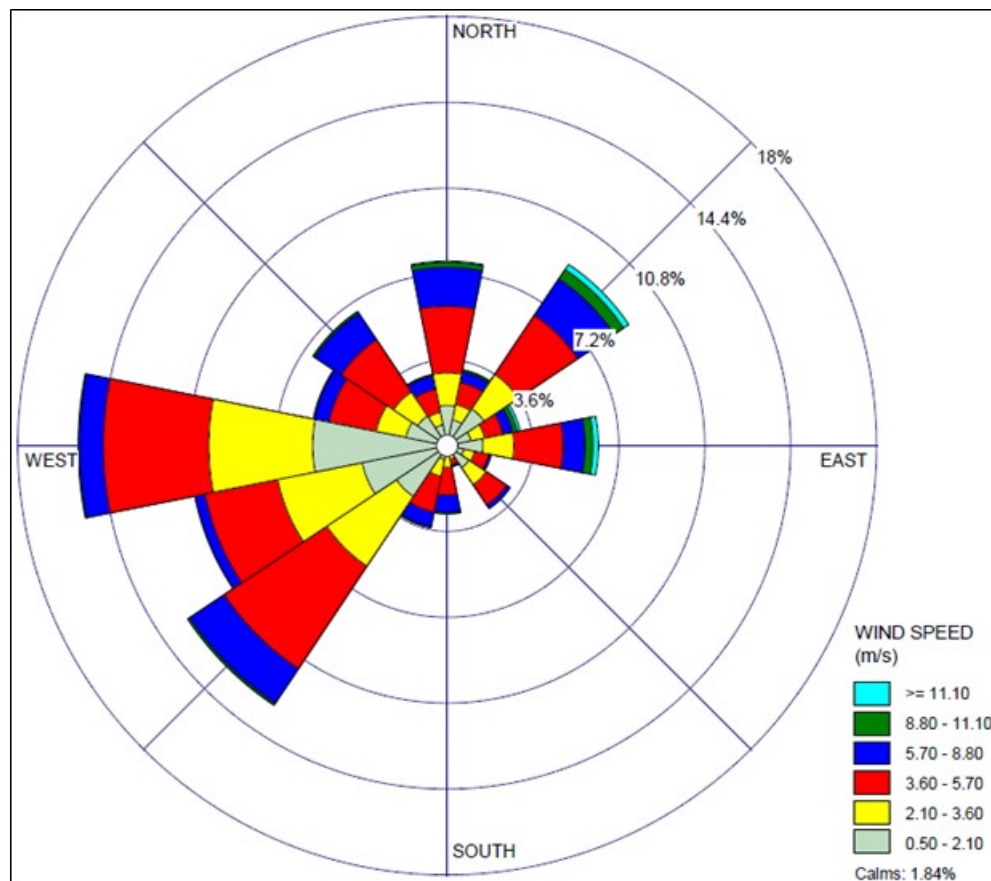


Figure 2: Burlington Piers Wind Rose; 1991-2011

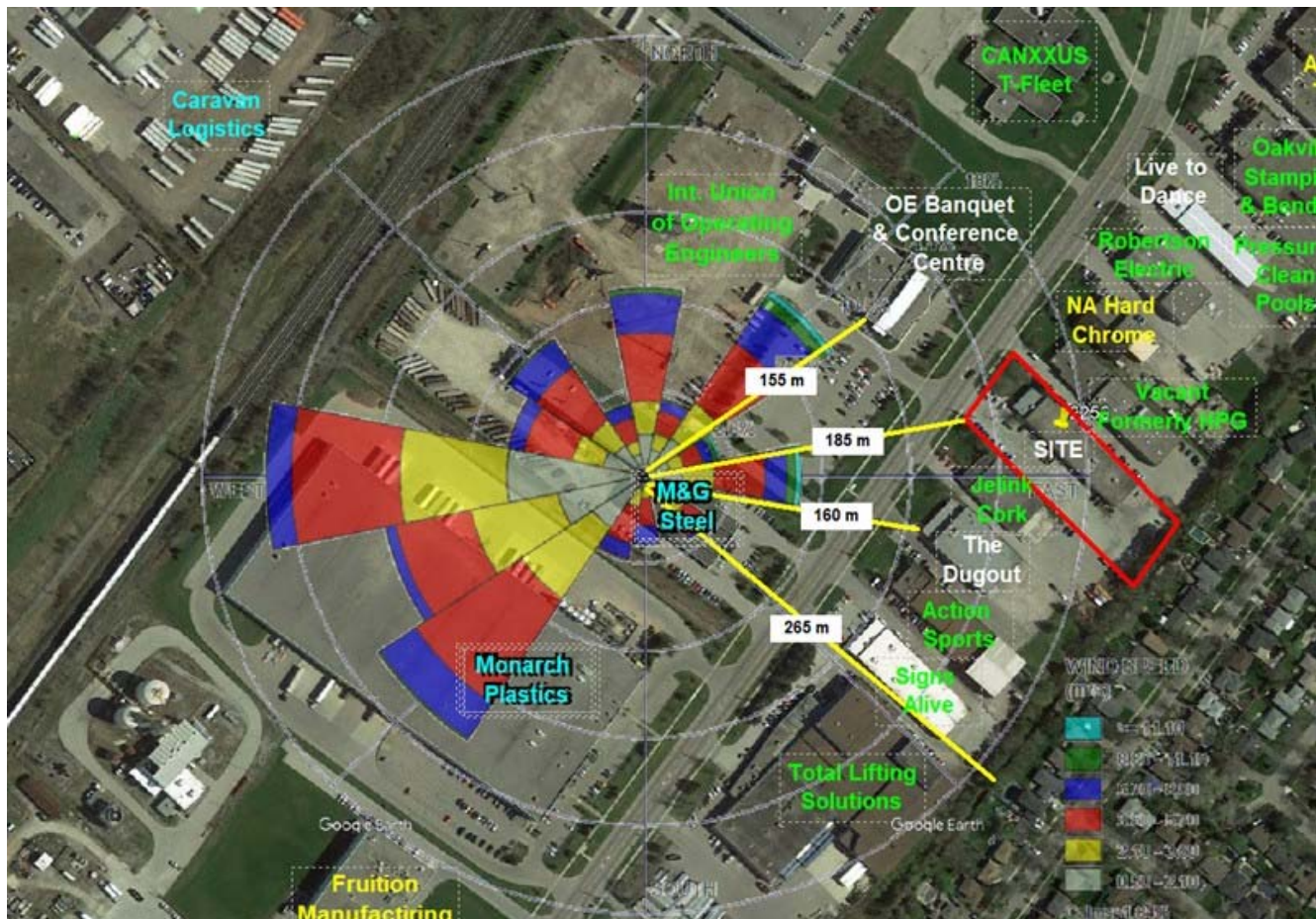
The effect of wind frequencies on potential impacts from industries flagged by Dillon as being of concern are discussed in detail below.

Dillon Comment 6

The Report states that M&G Steel Holdings is in a similar proximity to existing residences as the proposed land use, and as such odour issues are not expected. The proposed development is approximately 200 m from the industry, while the nearest residences in a similar downwind direction are 285 m or further. In addition, the proposed development has a line-of-sight view of the industry while the comparable residences do not. An unobstructed view of the industry can indicate that

dispersion of odours and contaminants may be limited. A technical assessment should be performed to determine the potential for impacts at the proposed development.

M&G Steel currently operates under an MECP approved Environmental Compliance Approval (ECA) (Number 7691-A6BN7R), and as such are required to meet respective contaminant standards at their property line and beyond, including the Site. The proposed redevelopment of the Site does not change the physical structure of the building (e.g., additional storey are not being added), and therefore the redevelopment will not affect compliance with the ECA.



Odours from M&G Steel operations have not been detected during any site visits. There is no history of odour complaints. In conclusion, considering the above, odour impacts from M&G Steel are not anticipated, and a more detailed assessment (i.e., dispersion modelling) is not warranted.

Dillon Comment 7

The Report states that Monarch Plastics Ltd. is required to operate under an odour management procedure, meaning that odours may occasionally be released from the industry. The Report concludes that there are existing residences at a similar distance from the industry. These receptors are located southeast of the facility while the proposed development is northeast from the facility. As discussed in (S), proximity cannot be used to compare receptors which are located in different directions from an industry. A technical assessment should be performed to determine the potential for impacts at the proposed development.

The terminology in Monarch Plastics' approved ECA (Number 5805-AHXPHN) outlines a number of operating procedures and maintenance programs required by the industry which are standard requirements for approvals for industries with limited operational flexibility. These generic requirement for the industry to prevent and/or minimize odorous emissions does not necessarily mean that the industry currently emits odours. It simply sets out a framework requiring the industry to control odour emissions if they occur in the future.

Figure 4 (next page) shows that there are existing sensitive land uses (the OE Banquet Centre and the Dugout) that are in similar downwind directions and are in fact closer than the Site, as well as the existing residential land uses in the area, and which are compatible with the industry. The Site is screened from Monarch Plastics sources by existing intervening buildings. Odours from Monarch Plastics operations have not been detected during any site visits. There is no history of odour complaints. In conclusion, considering the above, odour impacts from Monarch Plastics are not anticipated, and a more detailed assessment (i.e., dispersion modelling) is not warranted.

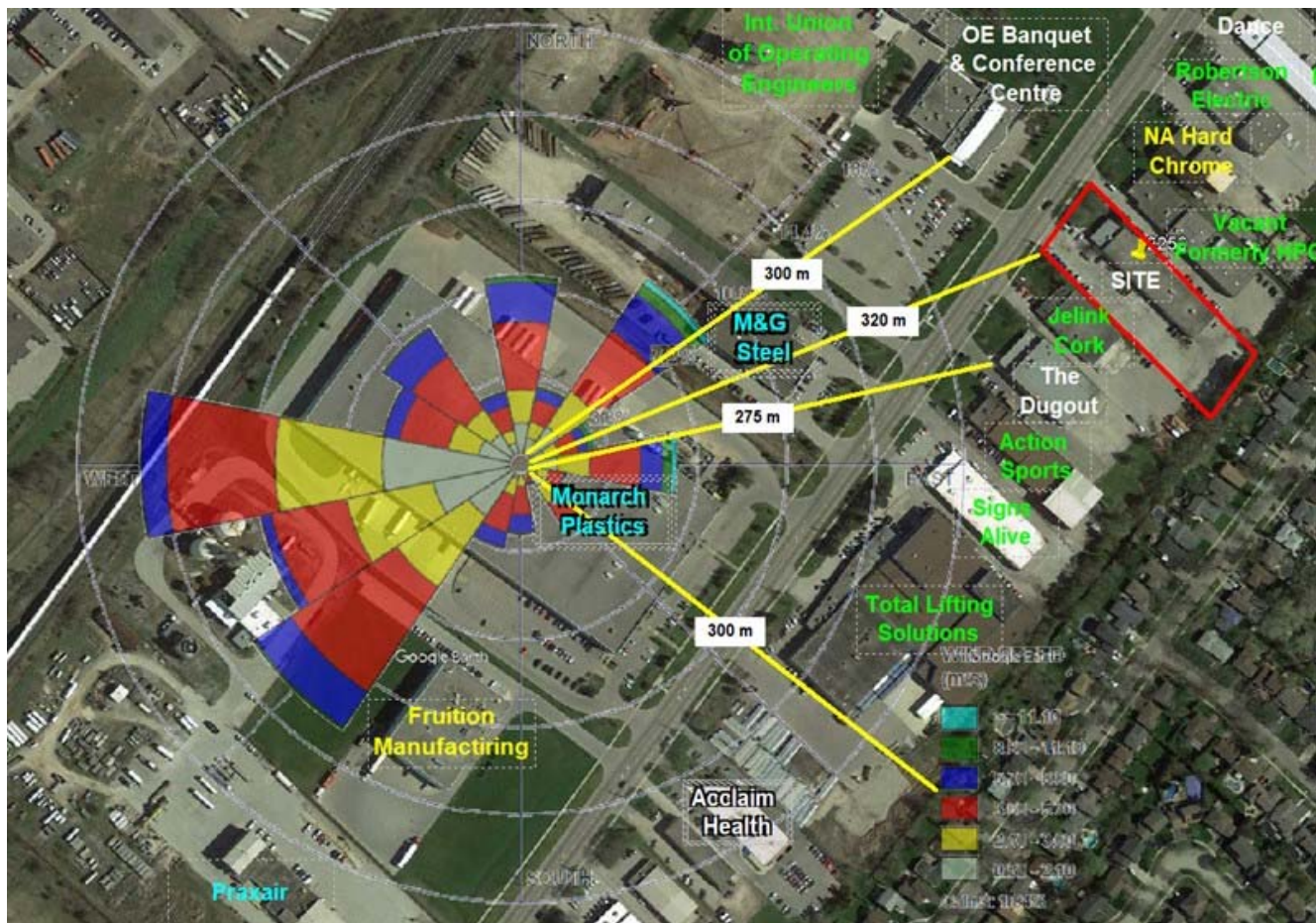


Figure 4: Wind Rose Superimposed on Monarch Plastics, and Distances to Sensitive Receptors

Dillon Comment 8

The Report states that Ropak Canada operates under an odour management procedure, meaning that odours may occasionally be released from the industry. The Report concludes that based on the distance between the industry and the proposed development odours are unlikely to pose a compatibility concern. While the separation distance between the Industry and the proposed development may be sufficient to promote adequate dispersion of odours, the proposed development would represent the nearest sensitive receptor to the industry with respect to wind direction. As such, a technical assessment should be performed to determine the potential for impacts at the proposed development.

Ropak Canada is a plastic packaging facility. The industry currently operates under an MECP ECA (Number 8771-A9DJDC) which lists the main sources of emissions from plastic injection moulds, UV printing, as well as from general exhaust and welding. None of the above sources typically generate significant amounts of odour. Again, as with the case of Monarch Plastics, the terminology included of Ropak Canada's ECA (Number 8771-A9DJDC) are standard operating procedures and maintenance programs required by the MECP and are not proof that odour emissions exist.

Figure 5 shows that there are existing sensitive land uses (the OE Banquet Centre) that are in similar downwind directions and are in fact closer than the Site, and which are compatible with the industry. The Site is screened from Ropak sources by existing intervening buildings.

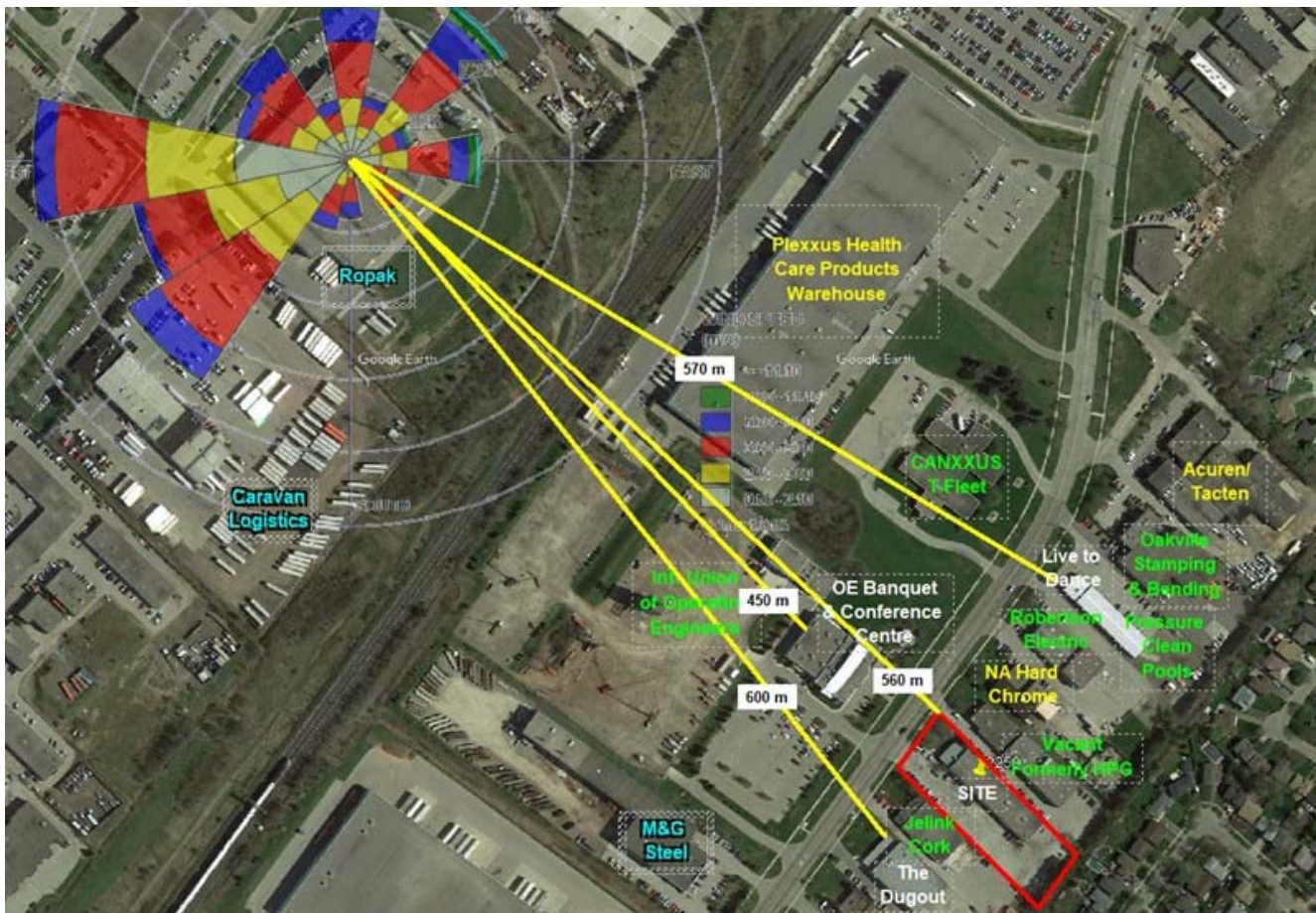


Figure 5: Wind Rose Superimposed on Ropak Canada, and Distances to Sensitive Receptors

Odours from Ropak operations have not been detected during any site visits nor are they likely to occur given the great separation distance ($> 500\text{m}$). There is no history of odour complaints. In conclusion, considering the above, odour impacts from Ropak are not anticipated, and a more detailed assessment (i.e., dispersion modelling) is not warranted.

Dillon Comment 9

The Report states that Caravan Logistics Inc. currently operates without approval from the MECP. The Report lists an air stripper for the removal of VOCs from wastewater as the primary source of emissions. The Report concludes that the industry's awareness of Ontario Regulations (as demonstrated by their Waste Management System Certificate of Approval) is sufficient to demonstrate compliance between the industry and the proposed development. As a technical assessment has not been performed for the industry, either for this assessment or in support of an Environmental Compliance Approval, it

is inappropriate to suggest that the Industry is compatible with the proposed development. The types of contaminants which may be emitted from the facility, and the dispersion of these contaminants with respect to the proposed development should be considered in formulating conclusions.

Caravan Logistics is a transportation company located at 2284 Wyecroft Road. The facility is a storage and maintenance yard for the transport vehicles and shipping containers.

Dillon has misunderstood the Novus Report. Trimac Transportation no longer located on the site. The VOC air stripper and vacuum extractor system listed in the Trimac ECA for the site are no longer in use. The Trimac ECA was mentioned simply because it shows up on the MECP *Access Environment* website as being linked to the property.

The nature of Caravan Logistics' operations (freight movements using vans and flat beds) is different from Trimac (bulk powder and liquid tankers), and such a system is not required. There are no significant air quality emissions associated with this type of facility. The only emission sources would in general be emissions from HVAC systems, and emissions from idling and moving trucks while onsite. Under Ontario regulations, emissions from these types of sources are exempt from MECP ECA and EASR requirements, due to the low potential for impacts. We note that Caravan Logistics is registered with the MECP with a Waste Management System Certificate of Approval and is, therefore, aware of MECP permitting requirements. The fact that they do not have an ECA or EASR for air emissions is likely due to the fact they are exempt.

Regardless of the site not having a registered ECA or EASR, Caravan Logistics are still obligated to meet the air quality standards at their property line and beyond.

Figure 6 shows that there are existing sensitive land uses (e.g., the OE Banquet Centre) that are in similar downwind directions and are in fact closer than the Site, and which are compatible with the industry. Odours from Caravan Logistics operations:

- Have not been detected during any site visits;
- Are not anticipated based on the nature of the operation;
- are not likely to occur given the great separation distance (> 500m).

There is no history of odour complaints. In conclusion, considering the above, odour impacts from Caravan Logistics are not anticipated, and a more detailed assessment (i.e., dispersion modelling) is not warranted.

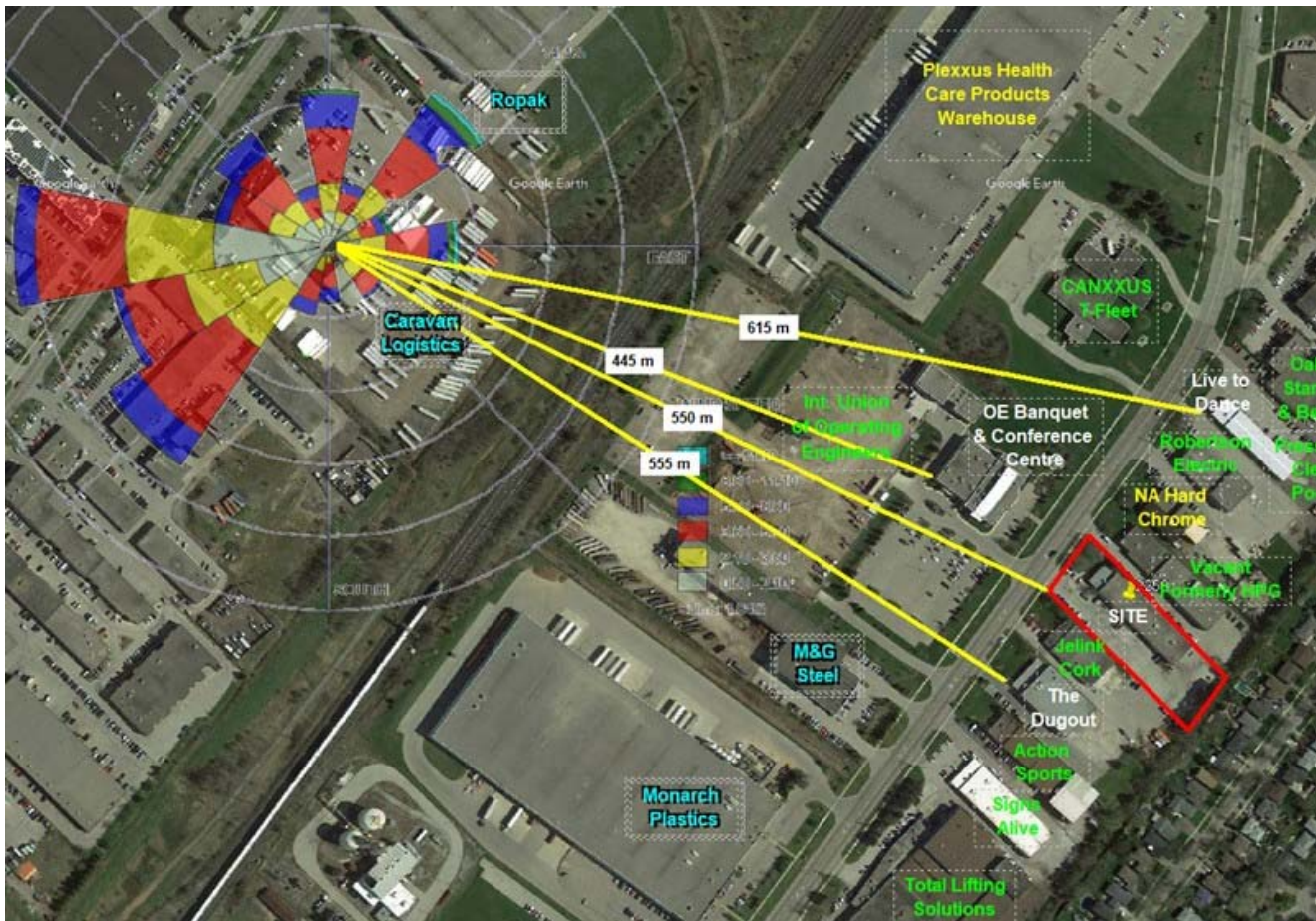


Figure 6: Wind Rose Superimposed on Caravan Logistics, and Distances to Sensitive Receptors

Closing

We trust that the above responses will address Dillon and the Region's comments and demonstrate that there are no concerns with the proposal, including the proposed mitigation measures, with respect to land use compatibility. In summary:

- There is no history of odour or dust issues or complaints in the area;
- The local industries in the area are compatible with the existing sensitive land uses in the area, including existing residences, and existing commercial and institutional uses. Several of these existing odour sensitive land uses closer to the industries than the proposed Site;
- The addition of the dementia care use at the Site will not result in more onerous MECP approval or mitigation requirements for general air contaminants, as the industries are already obligated to meet these standards at the Site;
- No odorous emissions have been detected from any of the surrounding industries with the exception of Fruition Manufacturing, which is 400 m away from the Site, and does not affect the Site; and

- Odours or dust from surrounding industries have not been detected at the Site during any site visit.

Based on the above, adverse air quality impacts are not anticipated at the proposed development; nor are impacts on the ability of surrounding industries to obtain/ maintain their required MECP approvals likely to occur. From an air quality perspective, there is no reason why the development should not proceed.

Regardless, based on discussions with Acclaim Health, some additional controls could be added to the facility design to further reduce potential impacts:

- The windows of the development will be sealed (inoperable).
- The HVAC system for the building should be designed to include space for the future installation of dust filter and carbon filters for odour control, should dust and odour be encountered in the future. The filters would be installed at the discretion of Acclaim Health, and only if complaints from staff and patrons occur.
- HVAC equipment air intakes on the units should face easterly, away from Speers Road.

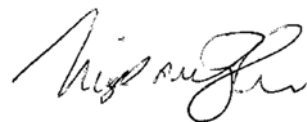
Should you have any questions or concerns, please do not hesitate to contact us.

Sincerely,

Novus Environmental Inc.



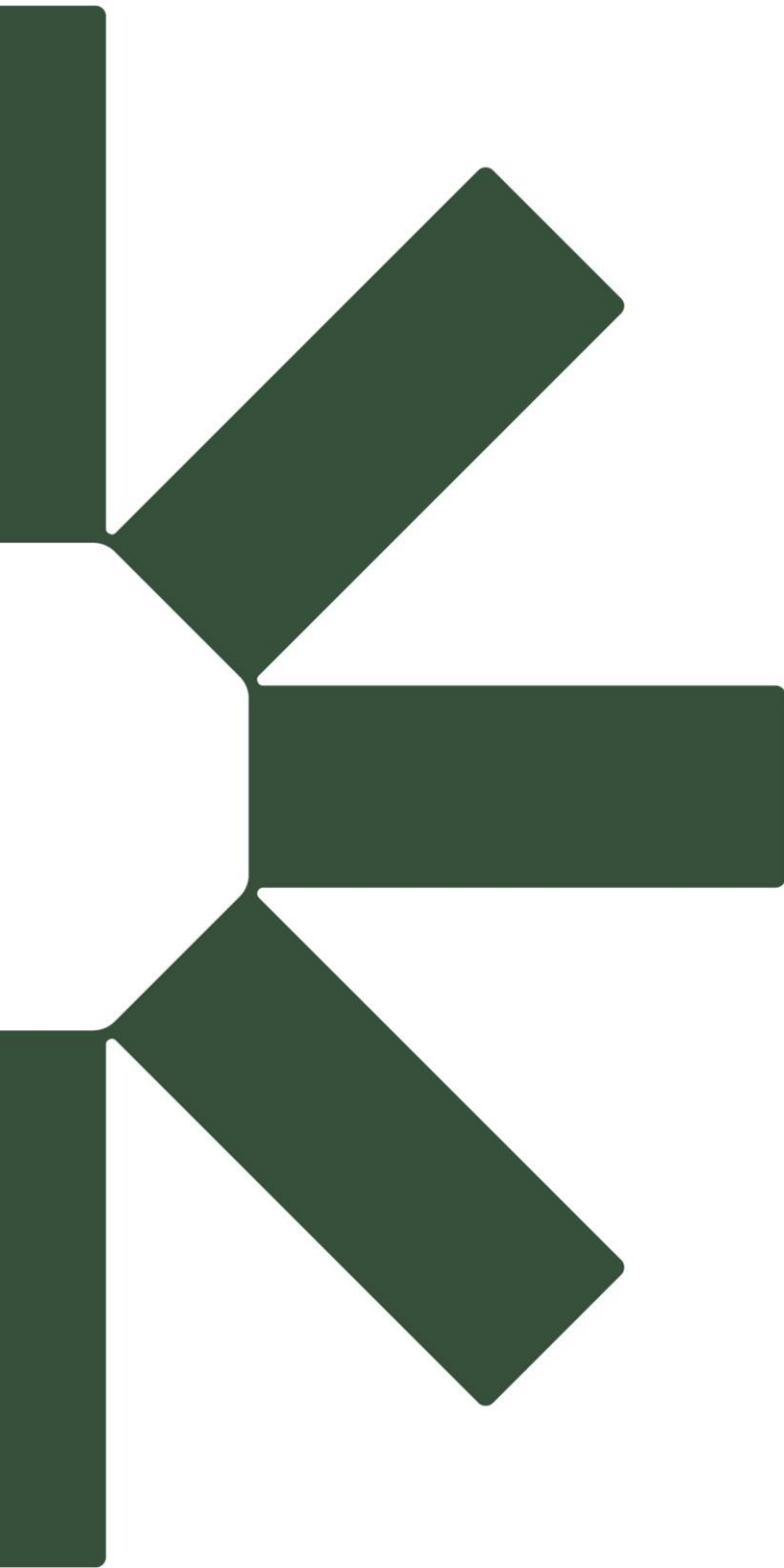
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Making Sustainability Happen