

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

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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 (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 car 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.

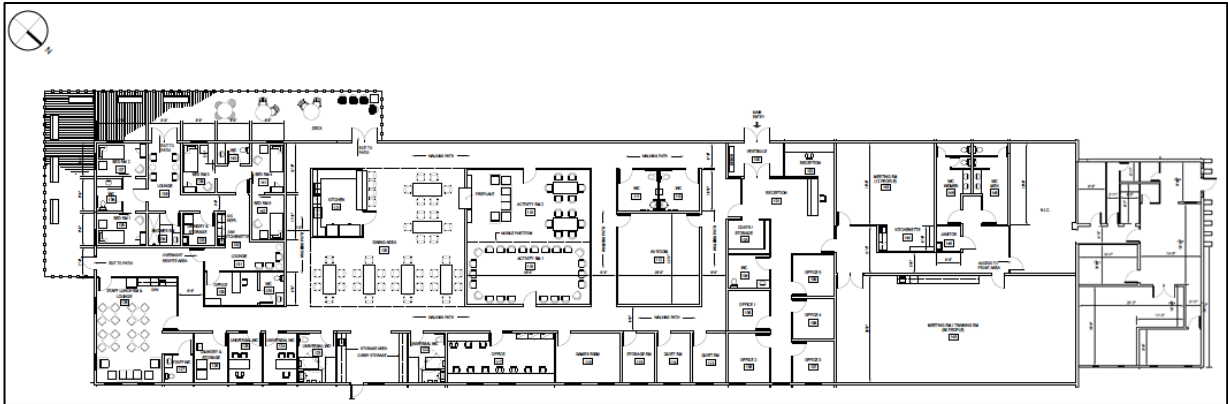


Figure 1: Proposed Development Context Plan

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: City of Brampton 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 Ontario Ministry of the Environment and Climate Change (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: Ministry of the Environment and Climate Change'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: Ministry of the Environment and Climate Change'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

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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 AofI? ^[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 palliative 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	Automobile 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

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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.

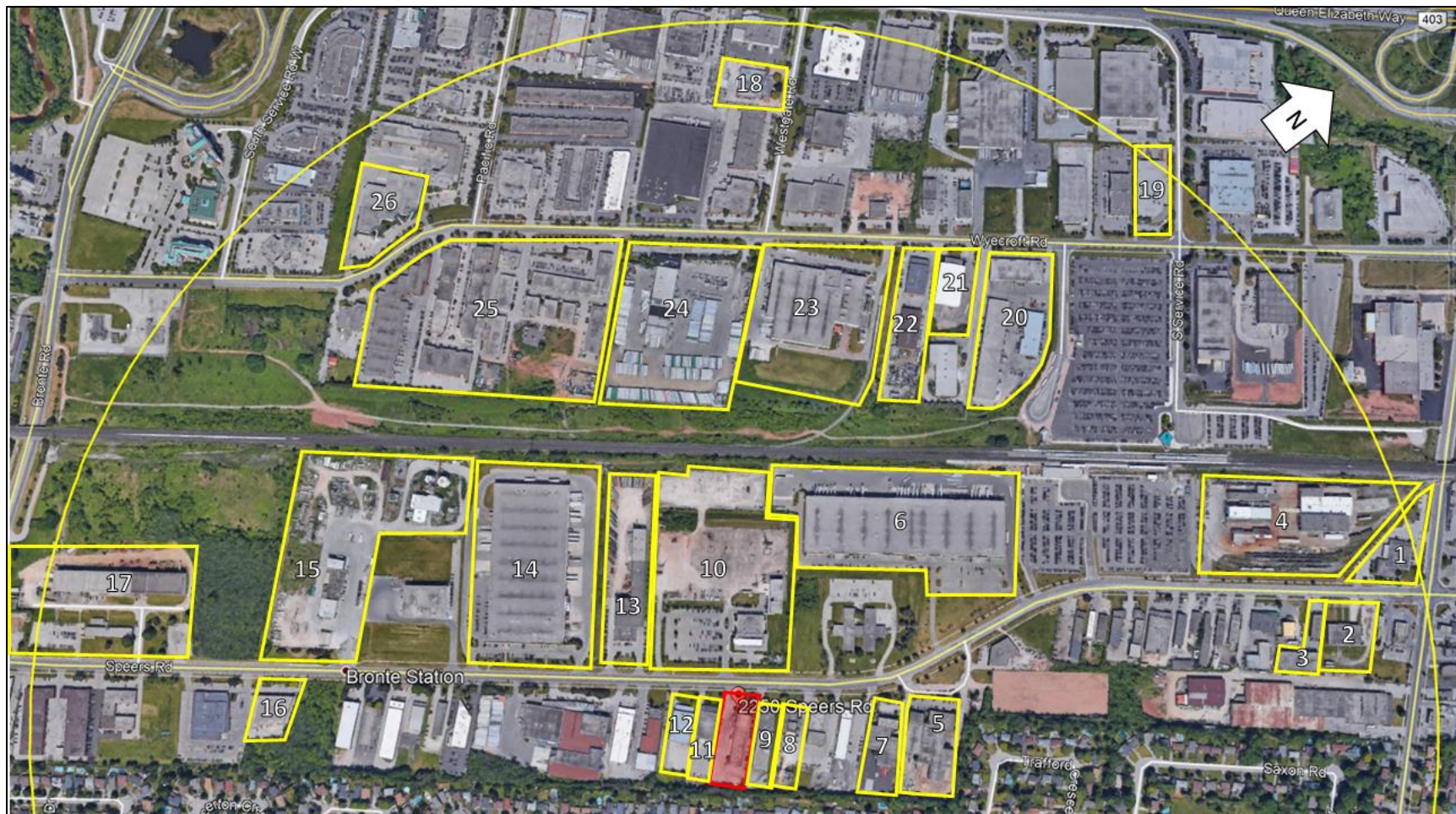


Figure 4: Industrial Identification within a 1km Radius of 2250 Speers Road

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-storeys 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 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 Halton Hills Zoning By-law 2010-0050, section 4.34 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 operations are subject to the Ontario Air quality standards within 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 odorous 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 plumbing 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 station 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 the 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 Wyecroft 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.