



June 6, 2025

City of Hamilton
71 Main Street West, 7th Floor
Hamilton, ON L8P 4Y5

Attention: Dave Heyworth

Via e-mail: Dave.Heyworth@hamilton.ca

Re: GTR-24004677-A0

Project Name: **Peer Review of Odour Feasibility Study submitted as part of White Church Urban Boundary Expansion Application**

Subject: **Peer Review of Odour Feasibility Study, dated January 17, 2025, prepared by Alliance Technical Group**

1 Introduction

EXP Services Inc. (EXP) was retained by the City of Hamilton to complete a peer review of the Odour Feasibility Study, dated January 17, 2025, prepared by Alliance Technical Group as part of the proposed White Church Urban Boundary Expansion Application, hereinafter referred to as the 'Study'. This report presents our comments. The stated objective of the study is to assess the feasibility of the Proposed Development in relation to potential odour impacts from existing and future industrial and agricultural operations within the study areas of 1000 and 1500 meters, respectively.

The Study has been reviewed for method, completeness, and accuracy of the findings in the Study. Our comments are provided in the following sections.

2 Scope of Work

EXP's peer review:

- Evaluation of the assumptions, methodologies and standards of practice used to prepare the assessment
- Review of the Study against the applicable policies of the Provincial Planning Statement and Rural Hamilton Official Plan

3 Peer Review Comments – Air Quality Assessment

3.1 Introduction

Alliance: The text in Section 1 of the Study provides the land use of the proposed site and surrounding lands; and a description of the Study Area. The study area buffers are clearly stated and the latest Urban Boundary Expansion Concept is included in Appendix A.

EXP Comments: EXP notes the latest Urban Boundary Expansion Concept provided in Appendix A and description of the Study Area accurately notes the area buffers. While EXP understands that planning is in the early stages, limited information is provided on the density of the residential land use. Opinion should be provided on whether there is a need for additional studies due to Site Plan details regarding the residential density such as if high density (i.e. high rise) or significant open spaces are being considered.

3.2 Relevant Guidelines

Alliance: The Provincial Guidelines reviewed as part of the Alliance's odour study included Provincial Policy Statement (PPS) 2024, MECP's D-6 Guidelines, Ontario Environmental Protection Act (EPA) and Ontario Regulation 419/05, and Ontario Ministry of Food, Agriculture and Rural Affairs (OMAFRA) Minimum Distance Separation (MDS) Document.

EXP Comments: EXP is of the opinion that the information provided with respect to the noted guidelines is accurate. It is also noted that the status of the City of Hamilton's Framework for Processing & Evaluating Urban Boundary Expansion Applications guideline, which is currently in draft, has not been included. Opinion should be provided regarding its status and potential impact on odour or a rationale provided as to why it is not included. In addition, the Canada Environment Protection Act reporting to the National Pollutant Release Inventory (NPRI) was not part of the on-line search conducted and should be included, or rationale as to why a search of the online database SWIM was not conducted.

3.3 Odour Emission Screening Assessment

Alliance: The odour emissions screening assessment provided a review of conceptual development plans, satellite imagery and Access Environmental website and direct observations conducted during the field visit on November 29, 2024.

EXP Comments: Details provided during the field visit on November 29, 2024, are limited to identification of existing industrial, commercial and agricultural uses. There was no indication of whether any odours were detected at Site or within the Study Area during the Site visit or use of an olfactometer or sampling to quantify any odours that may have been present. It is common practice to provide the method and results of air sampling and odour community surveys as part of the Study process; or a rationale as to why they were not conducted be included. There is also no indication of whether Alliance contacted MECP or the City of Hamilton regarding any odour complaints within the study area. It is common practice to include a complaint history or rationale as to why it is not included.

3.3.1 Section 3.1 Existing Industrial and Commercial Land Uses

Alliance Findings: According to Table 2, five (5) facilities were noted as having odour emission sources within the 1000 m. Study Area. All facilities were outside the minimum separation distance and area of influence for the class they were assigned.

EXP Comments: Two (2) automotive service garages were noted as autobody shops. However, a review of satellite imagery and aerial photographs, as well as an online search of business operations indicated no stacks or operations that included auto body repair or auto paint refinishing. Additionally, two (2) automotive service garages with similar characteristics were located on Homestead Drive (Mount Hope Automotive and Homestead Elite Automotive) but were not listed in Table 2. While emissions from these sources are not expected to be an issue, the report should be updated accordingly.

Greenhorizons Sod Farms / Big Yellow Bag, located at 2907 Upper James Street, is a facility with outdoor storage including large stockpiles of topsoil and troughs at the rear of the property for further raw material storage. It is noted the location of the outdoor storage is approximately 950 m north of the Site and would be considered outside the minimum separation distance and area of influence for a Class II facility. Dust and fugitive emissions are a possible issue, and the report should be updated accordingly.

It is noted that the Hamilton Airport Fuel Facility Corp, has been included in the assessment. Clarification on whether the parcel of land includes the John C. Munro Hamilton International Airport and its operations has been considered should be provided.

3.3.2 Section 3.2 Existing Agricultural Land Uses

Alliance: Alliance conservatively used a 1500 m study area for agriculture operations and notes actual separation distances for individual farms cannot be accurately calculated without knowing specific operation details about each individual farm. Alliance has requested assistance from the City of Hamilton to obtain the appropriate information. Five (5) farms were listed in Table 3 as being within 1500 m.

EXP Comments: EXP agrees that actual minimum separation distances for agricultural facilities cannot be calculated without the necessary information for the calculation. Based on a review of satellite/aerial imagery, EXP noted additional farms located at 8149 English Church Road, 8010 Airport Road, 6180 Airport Road, and 6136-6146 White Church Road that are within lands 1500 m of the Site. It is noted the farms are of an unknown type and only 8149 English Church Road may have a manure storage tank.

The report should be updated to include the appropriate information.

3.4 Future Land Uses

Alliance: Alliance reviewed the Airport Employment Growth District Secondary Plan, Mount Hope Secondary Plan, Rural Land Use Designations to note the current zoning of the area surrounding the property infer any potential future land uses in the area. Alliance noted that the closest sewage pumping station is located approximately 1.25 km north of the Site and is equipped with a carbon filtration unit and operates under an ECA.

EXP Comments: EXP agrees with the zoning classification of the existing lands and that any land use not compatible with nearby sensitive receptors could require regulatory requirements to limit negative air quality emissions in the form of ECA and EASR which would restrict any potential significant odour emissions.

EXP notes there is a sewage pumping station located at 3359 Homestead Drive, approximately 40 m west of the proposed Site. The property was not listed in Access Environment for an ECA or EASR. Based on a review of satellite imagery a stack can be seen on the pumping station. If an additional sewage pumping station is needed, it could be subject to ECA approval. Accordingly, the report should be updated to include an assessment of 3359 Homestead Drive.

3.5 Meteorological Conditions

Alliance: An annual windrose figure was created with meteorological data from 2023. The indicated predominant wind directions were noted as west and northeast.

EXP Comments: It is common practice to consider a 5-year meteorological history in assessing the predominant wind directions. The Study should be updated to include a longer meteorological history or a rationale as to why it was limited to 1 year provided.

4 Conclusions

Alliance: In Section 6, Alliance concludes the Proposed Development is compatible with existing industrial operations and further assessment is required for agricultural operations within the study area.

EXP Comments: EXP agrees that further information is required for agricultural operations and that further study regarding odour is necessary for these agricultural operations to be adequately assessed. The study should be updated with respect to industrial sources noted in Section 3.3.1 of this review should be provided.

EXP notes transportation related air pollutants (TRAP) were not included as part of the Odour Feasibility Study. Given that Toronto Public Health considers TRAP to be a major local contributor to air pollution and of amplified adverse health impacts due to air pollution, developers should consider reducing exposure to TRAP by implementing on-site mitigation measures for developments residing in close proximity to highways and roads. Given Upper James Street, a major arterial roadway with significant traffic volumes (>10,000 vehicles/day) is located west adjacent to the proposed development, and White Church Road, a rural arterial road with significant traffic volumes (>5,000 vehicle/day) is located south adjacent to the proposed development, a review of TRAP emissions or implementation of mitigation measures should be considered for the proposed development.

5 Recommendations

Based on the above review, EXP recommends:

- The report be updated in regards to:
 - Industrial sources not listed in Table 2;
 - Agricultural sources not listed in Table 3;
 - A review of the City of Hamilton's Draft Framework for Processing & Evaluating Urban Boundary Expansion Application and opinion regarding its status and potential impact on odour or a rationale provided as to why it is not included.
- Consideration of the impact of:
 - Available data from the National Pollutant Release Inventory (NPRI), or rationale as to why a search of the online database SWIM was not conducted;
 - Meteorological data from a 5-year meteorological history in assessing the predominant wind directions, or a rationale as to why it was limited to one year;
 - Impact of TRAP emissions or implementation of mitigation measures that should be considered for the proposed development;
 - Inclusion of odour complaint history or rationale why the MECP or the City of Hamilton regarding any odour complaints within the study area was not included.
 - Any odours that were detected at Site or within the Study Area during the Site visit or use of an olfactometer or sampling to quantify any odours that may have been present or rationale as to why it wasn't considered.
- Addressing the gap of odour sampling data and method.

EXP does not consider the assessment adequate to determine compatibility without further study regarding the above.

6 General Limitations

Information in this report is considered to be privileged and confidential and have been prepared exclusively for the City of Hamilton. The purpose of this report is to provide the City of Hamilton with a Peer Review of the Odour Feasibility Study – Urban Expansion Area, Hamilton, dated January 17, 2025, prepared by Alliance. The information presented in this report is based on information provided by others and visual observations as identified herein. Achieving the objectives stated in this report has required us to arrive at conclusions based upon the best information presently known to us. No investigative method can completely eliminate the possibility of obtaining partially imprecise or incomplete information; it can only reduce the possibility to an acceptable level. Professional judgment was exercised in gathering and analyzing the information obtained and in the formulation of the conclusions we reach, but we commit ourselves to care and competence in reaching those conclusions.

Air quality conditions at various times may differ from those encountered. In addition, any changes to operations such as the introduction of new processes and/or alterations to air-handling equipment may render the conclusions of the report inaccurate or invalid. In the event of such changes, EXP should be contacted to re-evaluate the conditions with the assessed area and make appropriate revision to the original conclusions of this report

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7 Closure

We trust that the information provided in this report is satisfactory for your purposes. Should you have any questions or require more information, please do not hesitate to contact the undersigned.

Sincerely,

EXP Services Inc.



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Environmental Services



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