



The Corporation of

THE TOWNSHIP OF MELANCTHON

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June 22, 2026

Ministry of Environment, Conservation and Parks
Environmental Permissions Branch
135 St. Clair Avenue West
1st Floor
Toronto, Ontario
M4V 1P5

Attention: Ajay Persaud, Environmental Scientist, Permit to Take Water Unit

-and to-

Ministry of Natural Resources (Aggregates)
Section – Divisional Delivery Branch
300 Water Street
Peterborough, Ontario
K9J 3C7

Attention: ARA Approvals

Dear Sirs,

Re: Strada Aggregates Inc. PTTW No. 3210-AKRL9C and ARA Licence No. 129167, 625155 and 626199

At its meeting held on June 4, 2026, Council for the Township of Melancthon reviewed comments from Breton Lemieux, Bluewater Geoscience Consultants Inc. pertaining to Strada Aggregates Inc. - 2025 Annual Compliance Report dated March 25, 2026.

Following its review, Council has serious concerns regarding the Strada's failure to comply with the monitoring program associated with the Permit to Take Water and ARA site plans and the ability of the current monitoring network to accurately assess and protect local groundwater and surface water resources.

The Township understands from the 2025 Compliance Monitoring Report that numerous groundwater and surface water monitoring locations have been removed, altered, blocked, destroyed, decommissioned, or are otherwise no longer functioning as intended. Of particular concern is the fact that monitoring wells that form part of the approved monitoring network have become unavailable for monitoring purposes and have not been replaced or re-established. Council is equally concerned that several surface water monitoring locations have not been monitored, resulting in gaps in the monitoring record.

Staff acknowledge the June 3, 2026 letter from Tatham Engineering responding to Bluewater's comments. Despite this response, staff remain concerned that Strada has not complied with the monitoring requirements of the PTTW and ARA site plans and that the proposed "Plan of Action" is inadequate. Firstly, it is vague and provides no detail on how the sufficiency of monitoring coverage will be assessed or maintained. Secondly, staff do not agree that wells within the extraction footprint should be removed without replacement. Staff are not aware of either Ministry having approved changes to the monitoring requirements in either the PTTW or ARA site plans.

Given the significance of these concerns, Council believes it would be irresponsible to permit continued water taking activities without first ensuring compliance with the approved monitoring network or approval of alternative monitoring arrangements. The absence of a complete monitoring program compromises the ability of regulatory agencies, the Township, and the public to assess compliance with permit conditions and environmental performance.

Accordingly, Council is formally requesting that the Ministry of the Environment, Conservation and Parks and the Ministry of Natural Resources take the following immediate actions:

1. Suspend Strada Aggregate Inc.'s Permit to Take Water (PTTW Number 3210-AKRL9C dated May 8, 2017), and pause on the approvals process for the new PTTW (ERO 025-1082) pending a comprehensive review of the monitoring program and verification that all required groundwater and surface water monitoring locations have been properly established, restored, and are functioning as intended, or have been replaced to the satisfaction of both Ministries;
2. Conduct an immediate compliance inspection of the site by a qualified Ministry Compliance Officer or Enforcement Officer to assess compliance with all applicable permit and ARA licence conditions, approvals, monitoring requirements, and reporting obligations and to verify the status and condition of

all groundwater monitoring wells, surface water monitoring stations, and associated monitoring infrastructure identified in the approved monitoring program;

3. Determine whether the removal, destruction, blockage, alteration, decommissioning, or failure to replace monitoring locations constitutes non-compliance with any permit, licence, approval, or regulatory requirement;
4. Provide Council with a written report outlining the findings of the inspection, any compliance concerns identified, and the corrective actions that will be required of Strada Aggregates Inc.; and
5. Advise Council of any enforcement measures, permit amendments, or additional monitoring requirements that may result from the Ministry's review.

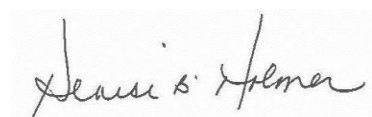
The protection of groundwater and surface water resources within the Township of Melancthon remains a priority for Council and our residents. Given the documented failure to comply with in-force monitoring requirements and the concerns raised by the Township's Hydrogeological Consultant's review, Council expects immediate Ministry intervention to ensure that the public interest and environmental resources are adequately protected.

The Township respectfully requests a written response outlining the Ministries' intended course of action at your earliest opportunity.

Please find attached a copy of Bluewater Geosciences Consultants Inc.'s review for your consideration.

Thank you.

Yours truly,

A handwritten signature in black ink, appearing to read "Denise B. Holmes". The signature is written in a cursive, flowing style.

Denise B. Holmes, AMCT
CAO/Clerk

Encl.

BLUEWATER GEOSCIENCE CONSULTANTS INC.

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May 19, 2026

Mayor White and Members of Council,
The Township of Melancthon
157101 Highway 10,
Melancthon, Ontario
L9V 2E6
Attn.: Ms. Denise Holmes, A.M.C.T., Clerk-Treasurer

Mayor White and Members of Council:

Bluewater Geoscience Consultants Inc. (Bluewater) was asked to review the report entitled “**Strada Shelburne, Annual Compliance Report**” dated March 25, 2026 and prepared by Tatham Engineering as well as comments made by Council during the May 7, 2026 Council Meeting.

The reviewed report details the 2025 groundwater and surface water monitoring and sampling activities completed for the Strada Melancthon pit. The report is completed as required by the terms of the site Permit To Take Water (PTTW) Number 3210-AKRL9C dated May 8, 2017 and the Integrated Monitoring Plan (IMP) dated February 2018.

During our review of these documents, it appears that the groundwater and surface water monitoring network stipulated in the PTTW and IMP has become degraded through time. This appears to include groundwater monitoring wells that have been destroyed/removed/blocked etc. and are no longer available for monitoring as well as surface water monitoring locations that have been removed/alterd or decommissioned and not reestablished and/or are monitored inconsistently.

Section 4.2 of the PTTW and Table 1 of the IMP provides a list of groundwater and surface water monitoring locations that are required to be monitored and/or sampled on a semi-annual or annual frequency. The requirements of the PTTW indicates these locations ‘shall’ be monitored indicating that all monitoring locations need to be maintained and should any locations become unusable, it must be replaced in a timely manner to continue compliance with the PTTW and IMP.

It appears that as many as nine of the required monitoring locations may no longer be available and/or suitable to fulfill the requirements of the PTTW and IMP. It is reasonable for Council to view these missing monitoring locations as unacceptable and they form a fundamental non-compliance with the requirements of the PTTW and IMP that requires immediate attention.

As such, Bluewater recommends that Council request from Strada (at a timing to be determined by Council) a current inventory of all surface water, pond and groundwater monitoring locations provided in Section 4.2 of the PTTW and/or Table 1 of the IMP. This inventory should include the following information for each location:

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1. Is the location currently available, suitable and included in the monitoring/sampling required in the PTTW and IMP. Also, note which stratigraphic unit each location is intended to monitor;
2. Has the location become destroyed/blocked/discontinued/removed and not reestablished, the reason for such and the year in which this occurred. This should include all monitoring locations but is particularly important for pond and surface water monitoring locations. Where any monitoring location has become unavailable or unsuitable through time, we require a 'Plan of Action' to address and reestablish each monitoring location so they can complete adequate on-going monitoring and fulfill their requirements to maintain compliance with the Terms of the PTTW and IMP;
3. Provide an inventory of any monitoring locations added on the site since the PTTW and IMP were initiated, and if they are to be added/included in the on-going monitoring and sampling moving forward. Will Strada seek to amend the PTTW and IMP to reflect/include these new monitoring locations?

During past reviews it was also noted that there have been several instances of Strada taking water outside the April 1 to November 16 time window specified in Section 3.3 of the PTTW. It is difficult to view these occurrences as accidental, as the terms of the PTTW should be quite clear to Strada, and it is reasonable for Council to view these breaches as wilful and as fundamental non-compliance with the terms of the PTTW. Council may want to request further information on why/how these breaches occurred as well as some form of commitment from Strada that it will not happen in the future.

We trust you will find this review suitable for your current requirements, however please feel free to reach out to the undersigned if you require any further information.

Sincerely,
BLUEWATER GEOSCIENCE CONSULTANTS INC.



Breton J. Lemieux, M.Sc., F.G.C., Q.
President, Senior Geoscientist

Date: May 19, 2026