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Michael Kerford
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Subject: Well and MECP D-5-4 Evaluation for the proposed Flatt Point
Subdivision applications (OPA/ZBA/DPS/DPC), 3401 County
Road 13, Prince Edward County, ON

Dear Mr. Kerford:

This letter is provided as an Addendum to Malroz's June 2021 Hydrogeological Assessment regarding the above-noted applications. Prince Edward County (PEC) Staff provided comments in September 2025, requesting supplementary information regarding the proposed water supply and septic design, particularly to "demonstrate that nutrients from the proposed septic systems can be attenuated per applicable standards from the Ministry of Environment". Staff also requested that commentary be provided on the suitability of a communal water servicing approach. Our summary information on these two items is provided below.

1.0 Water Supply

Malroz prepared a June 2, 2021 Hydrogeologic Assessment that evaluated the use of drilled wells at the site which identified a number of issues associated with servicing through traditional drilled well means. In follow up to the hydrogeologic assessment a February 23, 2022 letter from Malroz, Jewell Engineering and the IBI Group evaluated provisions for a communal water system or shore/dug wells.

Given the complexities of a communal water system, the size of the development, associated costs and potential implications to the municipality, shore wells were considered the preferred alternative.

To further evaluate the site specific suitability of shore and dug wells Malroz prepared a letter dated May 17, 2024. The letter outlined that shore and dug wells were suitable to support the development. The letter included conditions that are recommended to be carried forward in a Draft Plan of Subdivision approval.

2.0 Terrain Analyses

We understand that PEC has requested information to demonstrate that nutrients from the proposed septic systems can be attenuated per applicable standards from the Ministry of Environment Conservation and Parks (MECP).

The impact of individual onsite sewage systems is typically evaluated through the MECP D-5-4 Individual On-Site Sewage System: Water Quality Impact Risk Assessment guideline. The guideline is focused on the nitrate impact on the groundwater at the development boundary. Considering the layout of the development the boundary is anticipated to be Lake Ontario and as such application of the D-5-4 is not necessary as the discharge of groundwater from the site will be to Lake Ontario. The guideline works on a three-step assessment process, with the first step being the evaluation of minimum lot size. For the proposed development we understand that each lot will be greater than 0.8 hectare (ha) and the average of the lots will be 1.0 ha or greater and in accordance with the D-5-4 further analyses is not required unless the site is hydrogeologically sensitive.

Malroz conducted a hydrogeologic assessment of the site and summarized the results in a letter dated June 2, 2021. The report included an assessment of baseline nitrate concentrations in three wells. The results were below laboratory detection at 2 of the wells and below 1 mg/L at the third well.

Groundwork Engineering prepared a Terrain Analysis Report for the site dated September 23, 2022. The report conducted a D-5-4 predictive nitrate assessment. The assessment predicted a 7.58 mg/L loading. Considering the background concentrations and the predictive assessment groundwater concentrations re predicted to remain below the 10 mg/L Ontario Drinking Water Standard.

Given the D-5-4 evaluations, including prior investigations, the implementation of private on-site sewage systems is appropriate.

3.0 Closure

We trust that the above responds to the questions provided by PEC.



The findings reported in this document are based on the tasks completed by Malroz under the mutually agreed scope of work. Professional judgement, experience with similar investigations, and available data collected within the scope of work, form the basis for this opinion letter. Malroz has prepared this letter using information understood to be factual and correct, and shall not be responsible for conditions arising from information or facts that were inaccurate, concealed, or not fully disclosed at the time of investigation.

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Should you require further information, or have any questions, please do not hesitate to contact the undersigned.

Respectfully submitted,

MALROZ ENGINEERING INC.



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