

February 4, 2025

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**Re: Review of a City of Brampton Email Prepared by Reshma Fazlullah, dated January 27, 2025,  
Regarding a Proposed Residential Development at 69 Bramalea Road, Brampton, Ontario.  
Alliance Technical Group (Alliance) Reference No. 27112**

## **1. INTRODUCTION**

Dillon Consulting Ltd. (Dillon) prepared two reports, “69 Bramalea Road Updated Air Quality Assessment”, dated June 17, 2024 and December 2024 to support an application by 69 Bramalea Holdings Ltd. for a proposed multi-storey residential and commercial development at 69 Bramalea Road in Brampton, Ontario. The Dillon report included the results from an initial site visit to the area surrounding the 69 Bramalea Road site on October 18, 2023, to assess ambient air odour or dust concentrations and identify the source of these nuisance contaminants if possible. Dillon made three additional site visits to the area on August 26, 27 and 29, 2024.

## **2. SITE VISIT OBSERVATIONS BY DILLION CONSULTING**

During the initial site visit Dillon assessed the ambient air for odour and dust near eleven facilities. Odours were detected near some facilities, including the Bank Brothers Sustainable Ingredients (Bank Brothers) business. The Bank Brothers odours were described by Dillon as “cooking-related odours” and that “the facility may emit frequent and occasionally intense odours”, although an MECP officer was not aware of any odour complaints related to the facility since at least 2018.

During the site visit on August 26, 2024, a “weak, slight odour” with “very little annoyance” was detected near the Bank Brothers facility and described as a “cooking/deep fry type odour”. A “garbage type odour” with “some annoyance” was assumed to be caused by the same facility.

During the site visit on August 27, 2024, a “landfill odour” could potentially be discharged from the Bank Brothers facility and was described as “weak, slight” and “annoying”.

During the site visit on August 29, 2024, an odour “similar to landfill odour” with “some annoyance” and “weak, slight odour” was attributed to the Bank Brothers facility. No other odours were detected.

### 3. LETTER REPORT BY SLR CONSULTING

On behalf of Bank Brothers, SLR Consulting (Canada) Ltd. prepared a letter report (SLR Report) dated September 24, 2024, which peer reviewed the Dillon report dated June 17, 2024.

Significant comments in the SLR Report are summarized as follows:

- No odour complaints have been recorded by the MECP since Bank Brothers took over the facility in 2017.
- Bank Brothers is only required to control odour levels at existing points of reception near the facility
- The proposed development may impose additional measures at the Bank Brothers facility to control fugitive odours.
- Scenario 2 dispersion modelling shows that the odour concentration at the proposed development will be 1.84 OU (odour units) compared with a base concentration of 1.00 OU at a single existing sensitive receptor.
- The frequency at which odours are predicted to impact the proposed development is not given.
- Nearest points of reception are 85 m for the proposed development and 220 m for existing sensitive receptors.
- Mitigation measures for the proposed development are appropriate, if implemented.

### 4. ALLIANCE COMMENTS ON THE SLR CONSULTING REPORT

Alliance comments about the SLR Report are:

- An ESDM report used as a basis for preparing the Bank Brothers Certificate of Approval (now known as an Environmental Compliance Approval) No. 5180-877PS August 31, 2010, application does not include an assessment of odour emissions. The ECA does not require compliance odour testing and the lack of odour complaints is an indication that odour testing has not occurred. Therefore, the odour dispersion modelling is not based on real odour emission data.
- Dispersion modelling procedures are based on an assumed maximum odour concentration of 1.00 OU at the nearest existing sensitive receptor. Apart from calculating that the maximum predicted odour concentration at the proposed development is 1.84 times higher than at the existing receptor, the dispersion modelling results have no additional value.
- The SLR Report quotes section 4.6.3 of MECP Guideline D-6 which states that odorous contaminants are difficult to control on-site. This quote is not generally correct and the Bank Brothers facility should be able to mitigate odour emissions so that they are barely detectable beyond the facility land boundaries.
- Although the SLR Report notes that the odour dispersion modelling does not consider the frequency at which odours are predicted to impact the proposed development, the wind rose in the Dillon Report shows that the wind will blow from the Bank Brothers facility towards the proposed development for approximately 4% of the time.

## 5. ALLIANCE RESPONSE TO THE CITY OF BRAMPTON EMAIL

The City of Brampton email, Attachment 1, lists the odour mitigation measures which are suggested by Dillon for the proposed development, summarized as follows:

- Centralized HVAC system to provide positive pressure for minimizing unit ambient air intake
- Air conditioning in the units and indoor amenities to allow closed windows and doors
- Fresh air intakes located in areas of low potential odour impact
- Warning clauses for purchasers and tenants about potential odour impacts

In my opinion, these mitigation measures are reasonable for the current situation. Apart from the warning clauses, these measures are typical in condominium building, including my own condominium unit in Toronto. The fresh air intakes should preferably be located on the roof of the building, which will be 28 stories high and much higher than the discharge stacks at the Bank Brothers facility which appear to be less than 8.0 m above grade. Another potential measure worth considering would be to eliminate open balconies at the units on the lower floors

The absence of odour complaints to the MECP since 2018 and the low frequency when the proposed development is downwind from the Bank Brothers facility indicate that complaints attributed to this facility are unlikely to occur. If Bank Brothers decide to expand their operations, an amended ECA will be requested by the MECP. The ECA will require that the new operations have adequate odour control equipment independently of whether the proposed development proceeds.

Alliance agrees that the proposed development is compatible with the Bank Brothers facility, but mitigation measures should be implemented since the site visit results show that there is some potential for Bank Brothers odours to be detected infrequently at the development, and perhaps odours from other facilities such as Weston Bakery.



Stephen Thorndyke, M.Eng., P.Eng.  
Principal, Odour Assessment/Analytical Services

**ATTACHMENT 1**

**City of Brampton Email, January 27, 2025  
(6 pages)**

## Stephen Thorndyke

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**From:** Fazlullah, Reshma <Reshma.Fazlullah@brampton.ca>  
**Sent:** January 27, 2025 12:08 PM  
**To:** Stephen Thorndyke  
**Subject:** RE: [EXTERNAL]Summary of 69 Bramalea Additional Site Visits

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Hi Steve,

Hope all is well with you.

You have already provided your final comments/Peer Review Summary on the Land Compatibility Study for the subject site.

We are in the process of completing our recommendation report to Council, saying that we are satisfied with the compatibility study for the proposed sensitive development.

However, I wanted to touch base with you one more time, as the Adjacent Facility Bank Bros. seems to still have concerns with the proposed development and will most likely end up appealing in the Land Tribunal.

Bank Bros. hired SLR as their consultant and have raised the following concerns:

- SLR does not agree with the Dillon Consulting conclusion that the Proposed Development is expected to be compatible with the operations of the Facility, based on the results of the odour assessment provided.
- Due to the proximity of the proposed Development to the Facility and the fact that the Development includes outdoor amenity areas and balconies facing the Facility, there is potential for future odour complaints. This puts the current Facility operations and the ability to expand the operations in the future at risk.
- The Report does not confirm whether the recommended mitigation measures for the proposed Development will be undertaken and whether they will be sufficient to address potential existing and/or future odour emissions from the Facility.

Dhillon's response to their concerns include the following Mitigation Measures:

- To reduce the potential for complaints at the Proposed Development from potential odorous emissions from Bank Brothers, the following mitigation measures are recommended:
- Design for centralized HVAC systems allowing the ability to positively pressurize the building to reduce the amount of ambient air leaking into individual units;
- Provision of air conditioning in all residential units and indoor amenity spaces to allow for windows to be closed to reduce odours;
- Locate fresh air intakes in areas of lower potential impacts, facing away from Bank Brothers, or behind a significant intervening building or structure; and
- Include appropriate warning clauses in Offers of Purchase and Sale, lease/rental agreements and condominium declarations which specify that due to the proximity of the surrounding industries, odours may at times be perceptible. An example of warning clause text is as follows: "Purchasers/tenants are advised that due to proximity of adjacent industries, odorous emissions from these facilities may at times be perceptible."
- With respect to SLR Comment C7 (While SLR agrees that these measures should be implemented by the Development, the Report does not guarantee that these measures will be adopted. In addition, these mitigation

measures do not limit the points of reception facing the Facility, as the Development includes outdoor amenity spaces and private balconies that face the Facility. The existence of these outdoor spaces increases the likelihood of complaints being made regarding emissions from the Facility.), Dillon understands the recommended mitigation measures and implementation schedule will be finalized at the detailed design stage of the project.

I just want to get your opinion one more time, to see if the suggested mitigation measures are acceptable and defensible, if challenged in the Land Tribunal.

Your advice/guidance is much appreciated, as always.

Regards,

**Reshma Fazlullah, M.Eng., L.E.L. (She/her)**

Manager, Environmental Compliance  
City of Brampton

**M: 416.848.5350**

[reshma.fazlullah@brampton.ca](mailto:reshma.fazlullah@brampton.ca)

**From:** Stephen Thorndyke <[stephen.thorndyke@alliancetg.com](mailto:stephen.thorndyke@alliancetg.com)>

**Sent:** 2024/09/26 3:21 PM

**To:** Fazlullah, Reshma <[Reshma.Fazlullah@brampton.ca](mailto:Reshma.Fazlullah@brampton.ca)>

**Subject:** RE: [EXTERNAL]Summary of 69 Bramalea Additional Site Visits

Reshma:

I have attached a few comments about the Dillon site visits. Let me know if you have any questions.

I am a little behind with my Odour Impact Assessment because of some large proposals I have been working on for Peel and Halton Regions. However, it will be ready by next Monday. Sorry for the delay.

Regards:

Steve



**ORTECH**  
AN ALLIANCE TECHNICAL GROUP COMPANY



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**From:** Fazlullah, Reshma <[Reshma.Fazlullah@brampton.ca](mailto:Reshma.Fazlullah@brampton.ca)>

**Sent:** September 23, 2024 2:42 PM

**To:** Stephen Thorndyke <[stephen.thorndyke@alliancetg.com](mailto:stephen.thorndyke@alliancetg.com)>

**Subject:** RE: [EXTERNAL]Summary of 69 Bramalea Additional Site Visits

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Thanks Steve, much appreciated.

**Reshma Fazlullah, M.Eng., L.E.L. (She/her)**

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**From:** Stephen Thorndyke <[stephen.thorndyke@alliancetg.com](mailto:stephen.thorndyke@alliancetg.com)>

**Sent:** Monday, September 23, 2024 2:40 PM

**To:** Fazlullah, Reshma <[Reshma.Fazlullah@brampton.ca](mailto:Reshma.Fazlullah@brampton.ca)>

**Subject:** RE: [EXTERNAL]Summary of 69 Bramalea Additional Site Visits

Reshma:

Thanks for the information. I will take a careful review and respond in a few days.

Regards:

Steve



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**From:** Fazlullah, Reshma <[Reshma.Fazlullah@brampton.ca](mailto:Reshma.Fazlullah@brampton.ca)>

**Sent:** September 20, 2024 10:39 AM

**To:** Stephen Thorndyke <[stephen.thorndyke@alliancetg.com](mailto:stephen.thorndyke@alliancetg.com)>

**Subject:** FW: [EXTERNAL]Summary of 69 Bramalea Additional Site Visits

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Hi Steve,

Happy Friday!

Can you please review the email below and attached table related to the additional site visits performed.

Please let me know, if the recommendations made by Dillion are acceptable.

Regards,

**Reshma Fazlullah, M.Eng., L.E.L.** (She/her)

Manager, Environmental Compliance  
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**From:** Seebach, Stephanie <[sseebach@dillon.ca](mailto:sseebach@dillon.ca)>

**Sent:** Monday, September 16, 2024 2:55 PM

**To:** Fazlullah, Reshma <[Reshma.Fazlullah@brampton.ca](mailto:Reshma.Fazlullah@brampton.ca)>

**Cc:** Anna Fagyas <[AnnaFagyas@medallioncorp.com](mailto:AnnaFagyas@medallioncorp.com)>; Mark Condello <[MarkC@gsai.ca](mailto:MarkC@gsai.ca)>; Johanna Shapira <[JShapira@woodbull.ca](mailto:JShapira@woodbull.ca)>

**Subject:** [EXTERNAL]Summary of 69 Bramalea Additional Site Visits

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Good afternoon Reshma,

Dillon has completed three additional site visits to 69 Bramalea and the surrounding area. I've attached a summary table of observations for each day. Each table has a corresponding aerial image showing the observation locations.

**Below is an overall summary of the observation tables:**

- Slight cooking-related type odours from Bank Brothers (BB) were detected once on Aug 26, when standing northeast of the BB property line. The odour was described as a weak, slight odour and was intermittent for approx 5 min and was not detected further downwind of BB. The odour was also not detected at 69 Bramalea. This odour was not detected at all during the August 27 and 29 visits.
- A slight garbage type odour was detected in front of BB on all three days of site visits, and the consistency and frequency varied. The origin and source characteristics of the odour is unknown. However, based on the location of the odour detection, the odour may be coming from BB. At times the odour was persistent with the wind for multiple minutes, other times the episode was only approx 5 seconds out of a 10-min period . Odour was described as a weak, slight odour and offensiveness was described as having some annoyance to being annoying. The odour was not detected further downwind of BB. The odour was also not detected at 69 Bramalea.
- Sweet, baking related odours were intermittently detected at 69 Bramalea on Aug 26. We are confident this odour is from the Weston Bakeries at 379 Orenda Rd (approx 600m SW of 69



Bramalea). The odour was detected approx 50% of the time during a 2 min period. When the odour was detected, it was described as distinct and medium level of odour. The offensiveness was described as pleasant and having very little annoyance. The baking odours were not detected at 69 Bramalea on Aug 27 or 29. The odour was detected when standing in front of the bakery on all three days.

**Additional discussion:**

It's Dillon's opinion that the collected data doesn't not change the original conclusions and recommendations of the Air Quality Assessment report. One of the purposes of the additional site visits was to confirm that elimination of outdoor balconies and amenity spaces is not required as a form of odour mitigation. Based on the location and intermittent frequency of the garbage odour detected in front of Bank Brothers, and infrequent detection of the faint cooking-related odours, it is Dillon's opinion that elimination of balconies is not required to mitigate odour impacts. Additionally, based on Valcoustics' noise report, enclosed balconies on the Proposed Development's Building 2 facade, which is closest to Bank Brothers, are already required to mitigate noise impacts.

With respect to Weston Bakeries, there are outdoor balconies and amenity areas of the Proposed Development that are facing the direction of Weston Bakeries. The existing residential buildings at 64 Bramalea Rd are closer, and in a similar direction as 69 Bramalea so we would expect similar (or less) impacts at 69 Bramalea compared to 64 Bramalea. It's expected that, if required, best practices implemented at Weston Bakeries to manage odour impacts at 64 Bramalea Road would also reduce impacts and the likelihood for complaints at the Proposed Development.

Our recommendation for next steps is to update the Air Quality Assessment report to include the site visit observations as well as a discussion on the odours detected. Please let us know if we can proceed with the report update.

Thank you,  
Stephanie



**Stephanie Seebach**  
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