

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPOSER: Sayisi Dene First Nation
PROPOSAL NAME: Sayisi Dene First Nation Sludge Drying Bed

CLASS OF DEVELOPMENT: Two
TYPE OF DEVELOPMENT: Waste Disposal – Wastewater Treatment Lagoons

CLIENT FILE NO.: 5021.00

OVERVIEW:

The Proposal was received on February 6, 2004. It was dated February 2, 2004. The advertisement of the proposal was as follows:

“A Proposal has been filed by UMA Engineering Ltd. on behalf of the Sayisi Dene First Nation for the construction and operation of a sludge drying bed for the community of Tadoule Lake. The sludge drying bed is a component of a new sewage collection and treatment system proposed for the community, and would be constructed south of the existing waste disposal ground and north of the community airport. Other components of the project are proposed to be located on reserve land, and are being assessed pursuant to the Canadian Environmental Assessment Act. The sludge drying bed would consist of two cells which would collect truck hauled sludge from a wastewater treatment plant. The cells would have a high density polyethylene liner, and would allow the sludge to be dewatered through settling. Supernatant would be pumped from the surface of the sludge drying beds and returned to the wastewater treatment plant for further treatment. No supernatant discharge to the environment would occur. Dried sludge would be disposed of either at an approved waste disposal ground, or by burial on site. It is anticipated that the facility would provide storage for a 20 year sludge accumulation. Construction of the facility is proposed for the summer of 2004.”

The Proposal was advertised in the Thompson Nickel Belt News on Monday, March 8, 2004, and in the Hudson Bay Post on Monday, March 15, 2004. It was placed in the Main, St. James-Assiniboia Public Library, Eco-Network, Thompson Public Library, Churchill Public Library, and MKO public registries and in the Sayisi Dene First Nation office as a public registry location. The Proposal was distributed to TAC members on March 2, 2004. The closing date for comments from members of the public and TAC members was April 9, 2004.

COMMENTS FROM THE PUBLIC:

No public comments were received.

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:

Manitoba Conservation – Sustainable Resource Management The cell sizing calculation does not factor in the effects of precipitation buildup in the cells and there is no mention of the frequency for removal of supernatant. As this information has not been provided it is recommended that a minimum freeboard of 0.5 metres be maintained in the cells at all times.

The vegetation on the side slopes of the cells should be limited to grasses and small shrubs. Any larger vegetation should be removed so that their root systems do not puncture the liner.

Analytical results from the monitoring of the groundwater observation wells should be forwarded to the regional environment officer within a thirty day period.

Disposition:

These comments can be addressed as licence conditions.

Historic Resources Branch No concerns.

Highway Planning and Design Branch As noted in Clause 4.1.1 of the Environment Act Proposal, Transport Canada has published guidelines recommending that lagoons not be located within 3.2 km of an airport, as they can attract birds which pose a hazard to aircraft, particularly in the landing and takeoff phases of flight (TP 1247E – Land Use in the Vicinity of Airports). At 300 m from the Tadoule Lake Airport landing strip, it would seem that the location of the proposed lagoon is extremely close and could create an unnecessary hazard, particularly if care is not taken, not only in its design and construction, but especially in its ongoing maintenance. It is important to ensure that the First Nation is fully aware of the Transport Canada recommendation and the proposal to ignore it.

The second last paragraph of Clause 1.8.4.1 states: “The (bird) deterrent method chosen for construction that is both functional and feasible for this particular project site is the overhead wire grid system. The smallest spacing will be used (2.5 m) to ensure the smallest gulls are deterred.” This is not detailed in the attached plans.

The final paragraph of Clause 1.8.4.1 states that: “Although not within the scope of this project, it is also recommended that an Airport Wildlife Management Plan be developed for the Tadoule Lake Airport.” It is suggested that the cost of such a plan to mitigate the increased risk of bird strikes due to the construction of a lagoon within 300 m of the airport must be the responsibility of the lagoon proponents. Northern Airport officials would be prepared to assist others (possibly consultants) in its development.

Disposition:

These comments were forwarded to the proponent's consultants for information. The provision of a bird deterrent cable grid over the proposed facility was discussed in the Proposal and can be addressed as a licence condition.

Community Planning Services Branch No land use or development concerns.

Soils and Crops Branch No concerns provided that the liner is installed and the dykes constructed to Manitoba Conservation's standards.

Canadian Environmental Assessment Agency A package of federal comments on the project was provided. No federal agencies indicated a desire in participating in the provincial review of the sludge drying bed component of the project.

Department of Fisheries and Oceans A letter of advice was provided on the complete project, including the components on First Nation land. None of the conditions in the letter were applicable to the sludge drying bed component. The letter also indicated that Canadian Coast Guard requirements with respect to the project had been met.

PUBLIC HEARING:

As no public concerns were identified, a public hearing is not recommended.

RECOMMENDATION:

All comments received on the Proposal can be addressed through licence conditions. It is recommended that the Development be licensed under The Environment Act subject to the limits, terms and conditions as described on the attached Draft Environment Act Licence. It is further recommended that enforcement of the Licence be assigned to Environmental Approvals until construction is completed. Once the facility is commissioned, enforcement should be assigned to the Northeast Region.

PREPARED BY:

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