

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPONENT: Rural Municipality of Tache
NAME OF DEVELOPMENT: R.M. of Tache - Community of Lorette –
Wastewater Treatment Lagoon Expansion
CLASS OF DEVELOPMENT: Two
TYPE OF DEVELOPMENT: Wastewater Treatment Lagoon
CLIENT FILE NO.: 4482.10

OVERVIEW:

The Proposal was received on August 6, 2015. The advertisement of the proposal was as follows:

“A proposal was filed by the Rural Municipality of Tache for the expansion of Community of Lorette’s existing four-cell wastewater treatment lagoon that is located on River Lot 8 in the Parish of Lorette in the Rural Municipality of Tache. The proposed development consists of the following: a new aerated primary cell; a new secondary cell; and a phosphorous removal system with 3 backwash ponds. Treated wastewater from the wastewater treatment lagoon will be discharged between June 15th and November 1st of any year via the Seine River Diversion to Red River.”

The Proposal was advertised in Winnipeg Free Press on Saturday, September 12, 2015. It was also placed in the Legislative Library, the Millennium Public Library and in the online public registry.

The Proposal was distributed to TAC members on September 10, 2015.

The closing date for comments from members of the public and TAC members was October 13, 2015.

COMMENTS FROM THE PUBLIC

No public comments were received during the public comment period.

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE

Manitoba Conservation and Water Stewardship – Lands Branch

Land Management & Planning Section has no comment as no Crown Lands are impacted.

Manitoba Conservation and Water Stewardship – Water Control Works and Drainage Licensing Section

Any water control works (drains, culverts, dykes, dams, etc.) associated with this project will require licensing under the Water Rights Act – an application is attached for the

proponent's convenience. Any inquiries in this regard may be directed to the local Water Resource Officer. Their contact information may be found at:

http://www.gov.mb.ca/conservation/waterstewardship/licensing/pdf/officer_areas_of_focus_30mar2015.pdf

Disposition: This information was provided to the project's consultant for information on December 1, 2015.

Manitoba Conservation and Water Stewardship – Parks and Protected Spaces

Parks and Protected Spaces Branch has reviewed the proposal submitted pursuant to the Environment Act for Request for EAP review/comment - RM Tache - Lorette WWTL - File: 4482.10. The Branch has no comments or concerns to offer as it does not affect any provincial parks, park reserves, ecological reserves, areas of special interest or proposed protected areas.

Manitoba Infrastructure and Transportation – Highway Planning and Design Branch

No Concern.

Manitoba Conservation and Water Stewardship – Wildlife

No wildlife related concerns.

Manitoba Conservation and Water Stewardship – Environment Compliance and Enforcement

1. *While discharge is occurring, it is proposed to reopen the valves that isolate the discharging secondary cells from the primary cells to achieve a seasonal continuous discharge. Confirmatory testing of the discharging secondary cell is proposed 14 days after the discharging cell is removed from isolation. What action would occur should the confirmatory testing indicate that criteria are not being met? Has there been consideration of further testing through the discharge period to ensure continued compliance with license criteria?*

2. *Regarding backwash and sludge in the phosphorous removal backwash ponds, it is proposed that liquids will be pumped off the top of the solids and that evaporation over the summer will dry out the remaining solids prior to hauling them to a landfill. Note that the R.M. of Taché waste disposal ground cannot accept the sludge unless it has a slump of 150 mm or less as determined using the slump test method specified in their license. Have alternatives to disposal at a landfill been considered?*

Additional Information Request: A request for additional information was sent out to the proponent's consultant on December 1, 2015.

Proponent's Consultant's Response (received on December 24, 2015):

As with any new system, the operation will be subject to a learning curve as the operators determine how to maintain the system within the licenced parameters.

During the initial year or two of operation, we would request that flexibility be given to the RM to determine how the system will best operate. Ultimately, this flexibility will allow them to decrease inputs and costs. It is reasonable to expect that during this period more frequent testing will be required to determine the system characteristics throughout the various scenarios of discharge. However, once the operators have confidence and a greater knowledge of the system, we expect that the frequency of the testing will decrease to at most, once every two weeks.

We therefore suggest that the testing mandated in the Licence not be overly restrictive in terms of the number and frequency of the samples required, as it may prove to be onerous and without value in the long-term operation of the facility.

Nelson Environmental Inc. is involved with the project, specifically with the aeration system and the phosphorus removal system. They have already completed jar testing to determine liquid aluminum sulfate (alum) dosing ratios. They will be also be involved in the commissioning of the phosphorus removal system and initially overseeing the lowering of the phosphorus levels in the effluent to below 1 mg/L.

The most practical alternative for the R.M. of Taché is to landfill their alum sludge at this point. In the future, the RM has the option to investigate economical uses of the alum sludge.

Disposition: The above response was forwarded to Environment Compliance and Enforcement (ECE) representative on January 4, 2016 and the representative responded that ECE does not have any additional comment to provide regarding the response. The draft Licence requires that the proponent obtain approval prior to disposal of sludge to an approved landfill.

Office of the Fire Commissioner

No concerns or comments. .

Manitoba Conservation and Water Stewardship – Water Use Licensing Section

No concerns.

Manitoba Conservation and Water Stewardship – Office of Drinking Water

Office of Drinking Water has no concerns with the above noted EAP or proposed development with respect to drinking water quality or safety.

Manitoba Conservation and Water Stewardship – Air Quality

- *The proposal is not expected to have a significant impact on air quality.*
- *The odour clause is suggested to be included in the License.*

Disposition: The draft Licence contains a clause that requires the Licencee not to cause or permit an odour nuisance to be created as a result of the construction, operation or alteration of the Development, and to take such steps as the Director may require to eliminate or mitigate an odour nuisance.

Manitoba Conservation and Water Stewardship-Water Quality Management Section

- *The following effluent standards should be in place for the Community of Lorette wastewater treatment lagoon upgrade as per the Manitoba Water Quality Standards, Objectives and Guidelines Regulation (196/2011).*
 - *cBOD 25 mg/L,*
 - *TSS 25 mg/L,*
 - *Fecal Coliforms or Escherichia coli 200 MPN / 100mL,*
 - *Total phosphorus <1 mg/L,*
- *The total phosphorous limit of <1 mg/L should be applied as per section 5(2) of the Manitoba Water Quality Standards, Objectives and Guidelines Regulation under The Water Protection Act states: Phosphorus standard and compliance date 5(2) Beginning on January 1, 2016, the maximum allowable concentration of phosphorus in wastewater effluent discharged from a development to which this section applies is 1.0 mg/L total phosphorus.*
- *The Water Quality Management Section is concerned with any discharges that have the potential to impact the aquatic environment and/or restrict present and future uses of the water. Therefore it is recommended that the license require the proponent to actively participate in any future watershed based management study, plan/or nutrient reduction program, approved by the Director.*

Disposition:

- This information was provided to the project's consultant for information on December 1, 2015.

- The draft licence incorporates the recommended effluent limits including the requirement for the proponent to actively participate in any future watershed based management study, plan/or nutrient reduction program, approved by the Director.

Notice of Alteration Request – October 15, 2015

The project consultant submitted an alteration request dated October 15, 2015 stating that a 300 mm diameter (HDPE) pipe segment complete with gate valves and cleanout will be installed through the south dyke of the proposed secondary cell #3. The pipe would be capped off on the outside of the dyke and would not be used at this time. The R.M. of Taché is considering their options in potentially transferring liquid from the secondary cell of the Landmark wastewater treatment lagoon into the proposed secondary cell 3 of the Lorette lagoon in order to make use of the proposed phosphorus removal system. If this option is ever pursued, a notice of alteration would be submitted to Manitoba Conservation and Water Stewardship (CWS) along with the details of the connection.

Disposition: This proposal is acceptable and a clause has been added to the draft Licence to reflect that the proponent is required to submit a Notice of Alteration to the Director for approval prior to increasing the operating depth of storage cell No. 3 and adding aeration to that storage cell or modifying the operation of any cell of the aerated wastewater treatment lagoon.

Notice of Alteration Request –February 5, 2016

- It was proposed that the phosphorus removal system and building will be relocated approximately 125 metres south of the previous location, as shown on drawing C02, submitted in the E AP in Appendix D. It was also intended to submit tender drawings for the entire construction project when they are completed in March 2016.
- It was also proposed, as part of the construction, to replace two existing valves at the Lorette lagoon facility. These valves are located on the discharge pipes of Secondary Cell No. 1 and 2 and they discharge into Manhole (MH) 01 as shown on drawing C02 in Appendix D of the EAP. All clay material excavated to access the valves would be replaced and compacted according to the specifications.

Disposition: This proposal is acceptable.

PUBLIC HEARING

No requests for a public hearing were made, and a public hearing is not recommended.

CROWN-INDIGENOUS CONSULTATION

The Government of Manitoba recognizes that it has a duty to consult in a meaningful way with Indigenous communities when any proposed provincial law, regulation, decision or action may infringe upon or adversely affect the exercise of the Indigenous rights of that community.

The proposal is for construction of two cells (i.e., one treatment cell and one storage cell) to increase the treatment and storage capacity of the existing four-cell wastewater treatment lagoon, and addition of a phosphorous removal system in order for the treated effluent to meet the total Phosphorous limit of 1 mg/l. The proposed development will serve the Community of Lorette. As the treated effluent will be discharged to Red River through the Seine River Diversion, adverse effects on surface water or habitat for wildlife or fisheries are not anticipated.

Since resource use is not adversely affected by the project, it is concluded that Crown-Indigenous consultation is not required for the project.

RECOMMENDATION

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 retained by the Environmental Approvals Branch until construction of the aerated wastewater treatment lagoon is completed. Enforcement of the licence then should be assigned to the Eastern Region of the Environmental Compliance and Enforcement Branch.

Prepared by:

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April 7, 2016
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