

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPOSER: Suncrest Holding Co. Ltd.
PROPOSAL NAME: Suncrest Holding Co. Ltd. Domestic
Wastewater Treatment Lagoon
CLASS OF DEVELOPMENT: 2
TYPE OF DEVELOPMENT: Wastewater Treatment Lagoon–Waste/Scrap
CLIENT FILE NO.: 5565.00

OVERVIEW:

On January 16, 2012 the Department received a Proposal from South-Man Engineering on behalf of Suncrest Holding Co. Ltd. for the construction and operation of a new domestic wastewater treatment lagoon located in southeast quarter of Section 25-6-4 EPM in the Rural Municipality of De Salaberry, to serve the Suncrest Colony. The proposed development will consist of the construction of a new primary cell and a new secondary cell. Treated effluent from the wastewater treatment lagoon will be trickle discharged between June 15th and November 1st of any year into a field drain which flows to the east into a municipal drainage system (2nd order drain). The municipal drainage system will then convey the effluent to the northeast where it ultimately empties into the Tourond Creek approximately 2 km from the site.

On February 14, 2012 Manitoba Conservation and Water Stewardship placed copies of the Proposal in the Public Registries located at 123 Main St. (Union Station), the Winnipeg Millennium Public Library, the Manitoba Eco-Network, and the R.M. of De Salaberry Office. Copies of the Proposal were also provided to the Canadian Environmental Assessment Agency (CEEA) and the Technical Advisory Committee (TAC) members. The Department placed public notification of the Proposal in the Steinbach Carillon on Thursday, February 16, 2012. The newspaper and TAC notifications invited responses until March 15, 2012.

On April 4, 2012, Manitoba Conservation and Water Stewardship forwarded requests for additional information from the TAC to the proponent's consultant. On May 7, 2012, the consultant submitted responses to the comments and requests from the TAC.

On May 9, 2012, the consultant's responses were distributed to the participating TAC for review and comment.

All additional information necessary for the review was placed in the Public Registries

COMMENTS FROM THE PUBLIC:

No comments were received from the public.

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE (TAC):

Manitoba Conservation and Water Stewardship – Parks and Natural Areas Branch (March 12, 2012)

- *No concerns*

Manitoba Conservation – Wildlife & Ecosystem Protection Branch (February 27, 2012)

- *No concerns*

Manitoba Conservation - Sustainable Resource and Policy Management Branch and the Land Branch (March 13, 2012)

- *No concerns*

Manitoba Conservation and Water Stewardship – Pollution Prevention Branch- Air Quality Section (February 24, 2012)

- *No concerns*

Manitoba Health – Regional Health Authority – Central MB Inc(March 12, 2012)

- In general, Manitoba Health is in agreement/supportive for the proper management of sewage treatment to minimize risk to public health and damage to the environment.
- We have no major concerns for the development of and licensing of these lagoons.

Manitoba Conservation and Water Stewardship – Environmental Compliance and Enforcement – Eastern Region (March 14, 2012)

Method of Discharge:

- *The EAP indicates that measures will be taken to ensure discharges from the Suncrest Holding Co. Ltd. facility do not coincide with effluent discharges from the Kleefeld wastewater treatment lagoon. Environmental Operations Branch supports this strategy and requests further details on the steps that will be taken to avoid simultaneous discharges.*

Discharge Procedure:

- *Chlorination is proposed as a possible method of treatment if the coliform MPN exceeds the limit. There is no discussion of potential downstream impacts from chlorine residuals/chlorination by-products, or how such impacts will be mitigated.*

Impact of Discharge to Waterways:

- *Environmental Operations Branch recommends that Table 1: Minimum Standards for Effluent Quality include a standard for total chlorine residual in the event chlorination treatment occurs.*

Proponent Response (May 7, 2012)

- Method of Discharge - In order to avoid a simultaneous discharge with the Kleefeld wastewater treatment lagoon it is proposed that the operator/manager of the Suncrest facility will communicate directly with the operator/manager of the Kleefeld facility in order to coordinate their discharges. As the Suncrest facility has been designed based on a conservative hydraulic loading, first preference will be given to the Kleefeld facility as it serves a much greater population centre.
- Discharge Procedure - Chlorination will only be used as a last resort in the event that the conform MPN limit cannot be achieved prior to requiring a discharge event. Sufficient retention capacity has been incorporated into the proposed facility to allow for additional treatment time should it be required to achieve the necessary Effluent Quality Standards. In the event that chlorination is required, the amount added will be minimized in order to reduce the residual effects. The utilization of trickle discharge will also provide an effective method of decreasing any residual chlorine by-products by increasing the retention time within the discharge ditch before it enters into the Tourond Creek.
- Impact of Discharge to Waterways - In the event that an Effluent Quality Standard for total chlorine residual is imposed, the intent would be for the proponent to meet these requirements during the entire discharge procedure. Additionally, they would undertake to alter and adopt a management practice to avoid the need for chlorination thereby eliminating the issue.

Disposition:

- After receiving the additional information from the proponent, no further comments were received from Environmental Compliance and Enforcement Branch.

Manitoba Conservation and Water Stewardship – Environmental Services (March 06, 2012)

- *The design indicated on pages S1 and S2 shows different dimensions for the width and length of the cells.*

Proponent's Response (May 7, 2012)

- Upon review of S-1 and S-2 of the submitted proposal drawings it has been confirmed that the dimensions on S-2 are in error and should be reflective of the dimensions on S-1. Attached is the revision to page 8-2 indicating the appropriate dimensions.

Disposition:

- After receiving the additional information from the proponent, no further comments were received from Environmental Services Branch.

Manitoba Conservation and Water Stewardship – Planning and Coordination Branch (March 13, 2012)

- *The Water Stewardship Division requires an Environment Act Licence to include the following:*

- *The Licencee is required to comply with the Manitoba Water Quality Standards, Objectives and Guidelines Regulation under The Water Protection Act, including achieving the following effluent discharge limits:*
 - *5-day Biochemical Oxygen Demand ≤ 25 mg/L*
 - *Total Suspended Solids ≤ 25 mg/L*
 - *Fecal Coliform ≤ 200 MPN/100mL*
 - *Total Phosphorus ≤ 1 mg/L*
- *The Licencee shall implement trickle discharge at a rate of 0.006 m³/sec over a 27-day period during non-flood conditions.*
- *Prior to beginning drain construction, the Licencee is required to submit an application for a Water Rights Licence to Construct Water Control Works.*
 - *A contact person is Mr. Geoff Reimer C.E.T., Senior Water Resource Officer, Water Control Works and Drainage Licensing, Manitoba Conservation and Water Stewardship, Box 4558, Stonewall, Manitoba R0C 2Z0, telephone: (204) 467-4450, email: geoff.reimer@gov.mb.ca.*
- *The Licencee shall actively participate in any future watershed based management study, plan/or nutrient reduction program, approved by the Director.*
 - *Note: The Water Stewardship Division is concerned with any discharges that have the potential to impact the aquatic environment and/or restrict present and future uses of the water.*
- *The Water Stewardship Division recommends the following:*
 - *The Water Stewardship Division recommends for the proponent to implement actions to reduce the sodium adsorption ratio in their wastewater. High sodium adsorption ratio levels limit the opportunities to reuse the valuable nutrients in wastewater. Discharging effluent into a waterbody with a high sodium adsorption ratio can also have a negative impact on aquatic life. The proponent should explore alternative water softening options and report back to the Director, Environmental Assessment and Licensing Branch, in one year.*
- *The Water Stewardship Division submits the following comments:*
 - *The Water Stewardship Division does not object to this proposal, at this time.*

Proponent's Response (May 7, 2012)

- The proponent is in agreement with abiding with all of the recommendations put forth within this document as many of these items will typically be a condition of the operating licence. A Water Rights Licence To Construct Water Control Works will be obtained prior to undertaking any drain construction associated with the proposal. Monitoring of the Sodium Adsorption Ratio will be performed to determine the anticipated level at discharge. In the event that it is determined that modifications to the current water softening procedure are required in order to reduce these levels, alternatives will be explored. The outcome of these findings will be reported to the Environmental Assessment and Licensing Branch.

Disposition:

- After receiving the additional information from the proponent, no further comments were received from Manitoba Water Stewardship.

COMMENTS FROM FEDERAL REPRESENTATION:

Canadian Environmental Assessment Agency (CEEA) (March 21, 2012)

- *Project information was shared with the Department of Fisheries and Oceans Canada (DFO), Health Canada (HC), Environment Canada (EC) and Western Economic Diversification as part of the federal coordination process. No federal interest was identified by the survey and environmental assessment of the project under the Act will not be required.*
- *HC has indicated it can contribute expert advice related to human health, to an RA if a written request is submitted to HC.*
- *EC has indicated it can contribute its expertise to an RA if a formal request for information is made.*
- *DFO has indicated it can contribute its expertise to an RA if a formal request for information is made.*

PUBLIC HEARING:

- A public hearing is not recommended because no comments were received from the public.

CROWN-ABORIGINAL CONSULTATION:

The Government of Manitoba recognizes it has a duty to consult in a meaningful way with First Nations, Métis communities and other Aboriginal communities when any proposed provincial law, regulation, decision or action may infringe upon or adversely

affect the exercise of a treaty or Aboriginal right of that First Nation, Métis community or other Aboriginal community.

There is no aboriginal community nearby the lagoon and would be no infringement of aboriginal or treaty rights under Section 35 of the Constitution Act, 1982. Therefore, it is concluded that Crown-Aboriginal consultation is not required for the project.

RECOMMENDATION:

The Proponent should be issued a Licence for the construction and operation of the wastewater treatment lagoon in accordance with the specifications, limits, terms and conditions of the attached draft Licence. Enforcement of the Licence should be assigned to the Environmental Approvals Branch until the liner testing has been completed and the Development is commissioned.

PREPARED BY:

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Manitoba Conservation and Water Stewardship
June 7, 2012

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