ENVIRONMENTAL APPROVALS BRANCH (EAB) COMMENTS ON CITY OF WINNIPEG RECOMMENDATIONS TO THE CLEAN ENVIRONMENT COMMISSION PUBLIC HEARINGS – JANUARY 20, 2003

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EAB COMMENTS ON CITY OF WINNIPEG RECOMMENDATIONS SEWAGE INVESTIGATION PUBLIC HEARINGS – JANUARY 2003

City Recommendation - Effluent Ammonia (NH₃) Reduction:

- a. That the discharges from the City's wastewater treatment plants be regulated on a site-specific basis consistent with the findings and recommendations of the City's study entitled "Red and Assiniboine Rivers Ammonia Criteria Study, Final Technical Report, November 2002" prepared by TetrES Consulting Inc., in association with North/South Consultants Inc., and external advisors.
- b. That the program related to control of ammonia to protect the aquatic environment in the Red and Assiniboine Rivers include:
 - i. Treatment of centrate at the North End Water Pollution Control Centre (NEWPCC),
 - ii. Continued use of the polishing ponds at the West End Water Pollution Control Centre (WEWPCC),
 - iii. No additional treatment works at the South End Water Pollution Control Centre (SEWPCC) for ammonia reduction with a review of the sitespecific requirement for ammonia treatment at the SEWPCC in 10 years.
- c. That additional studies, monitoring programs and testing of ammonia toxicity to expand the site-specific knowledge on the effects of ammonia on local species be undertaken in cooperation with Manitoba Conservation.

EAB Comment:

The Environmental Approvals Branch agrees with a site specific criterion approach for ammonia regulation.

As additional studies are required to confirm the site specific criterion, the Environmental Approvals Branch is of the view that effluent discharge limits for ammonia be developed using the November 22nd Final Draft Report-*Manitoba Water Quality Standards*, *Objectives, and Guidelines*, 75% allocation of the Red River for assimilation, and a 1913 to 2002 flow record period. Modifications to the discharge limits, if required, could be made following completion of the City's confirmation studies and agreement with a site specific criterion concentration for ammonia.

Centrate treatment at the NEWPCC should be in place for operation in 2005.

City Recommendation - Combined Sewer Overflow (CSO) Control:

That a long-term CSO control program be adopted in principle as described in the City's study entitled "Combined Sewer Overflow Management Study, Final Report, November 2002" prepared by Wardrop Engineering Inc., in association with TetrES Consultants, CH2M Gore & Storrie, EMA Services, and external advisors. The report provides a long-term alternative that would reduce overflow events on a citywide basis to an average of 4 events per summer recreation season (May 15 to Sept 30, inclusive) within about a 50-year timeframe.

EAB Comment:

The Environmental Approvals Branch is in agreement with the strategy to reduce the frequency of overflows to an average of 4 events per year. Consideration should be given to reduce the timeframe of implementation and on setting priorities for action based on loading from the specific CSO. (e.g. target areas of industrial operations first)

City Recommendation - Effluent Limits for the Water Pollution Control Centres (WPCCs)

a. That effluent discharge limits for the Water Pollution Control Centres be recommended to the Clean Environment Commission based on the existing secondary treatment performance.

b.That effluent discharge limits for fecal coliform be established to protect the Red and Assiniboine Rivers for recreational use during the summer recreation season.

EAB Comment:

The Environmental Approvals Branch has recommended effluent discharge limits be established to protect the Red and Assiniboine Rivers for the uses recommended by the Clean Environment Commission in 1992 and subsequently adopted by Manitoba Conservation. These recommended limits are as outlined in the presentation by Mr. Van Den Bosch.

City Recommendation - Reduction of Nutrients in Effluent Discharges

That it be recommended to the Clean Environment Commission that limits, which would entail tertiary treatment for nutrient reduction, not be established until the Province has completed their basin-wide Nutrient Management Study, and conducted stakeholder and public consultations.

EAB Comment:

The Environmental Approvals Branch agrees with this approach.

City Recommendation - Wastewater System Reliability

That the Clean Environment Commission be advised that the City will undertake Risk/Criticality Assessments at the three WPCCs in 2003 subject to Council approval of capital funding therefore to assess the reliability and backup capability of treatment systems to prevent the discharge of untreated sewage.

EAB Comment:

The Environmental Approvals Branch is of the view that the Risk/Criticality Assessments at the three WPCCs in 2003 be mandatory. Once the assessments are complete, the Branch will review and provide comments on them, and if necessary, address requirements by terms and conditions in the Environment Act Licences for the WPCC's.