

Conservation and Water Stewardship Environmental Stewardship Division Environmental Approvals Branch 123 Main Street, Suite 160, Winnipeg, Manitoba R3C 1A5 T 204 945-8321 F 204 945-5229 www.gov.mb.ca/conservation/eal

File: 5446.00

July 29, 2015

Darren Keam, M.Sc., P.Ag. Senior Project Manager Environmental Management MMM Group Limited 111 – 93 Lombard Avenue Winnipeg, MB R3B 3B1

Email: keamd@mmm.ca

Dear Mr. Keam:

## Re: Environment Act Licence No. 2994 – Rural Municipality of Springfield Wastewater Treatment Lagoons – Land Application of Sludge

I am responding to the July 17, 2015 MMM Group Limited (MMM) letter regarding land application of sludge from two Rural Municipality of Springfield (RM) wastewater treatment lagoons (lagoons) that are to be decommissioned. Environment Act Licence No. 2994 (Licence) applies to these proposed endeavours. The Licence was issued February 14, 2012 and is scheduled to terminate December 1, 2015. The letter is received as a Notice of Alteration (NoA).

The NoA indicates that the sludge currently remains in the cells of the two lagoons that are now fully grown over with bulrushes and reed canary grass that may best be removed in the winter for possible composting. The NoA also indicates that the sludge application contractor that will do the work is currently unavailable to initiate the work this year.

A new preferred scenario to undertake the required work is presented in the NoA and includes spreading the land application over three years (2016, 2017 and 2018) allowing for better planning for farm producers, application contractors and possible land reuse options. The new preferred scenario would also allow the RM to spread the associated financial cost for land application over three years and allows for a Risk Management Option in case of poor weather and/or field conditions. The NoA requests that the termination date of the Licence be extended to December 1, 2022, allowing three years of post-land application monitoring and reporting.

The NoA indicates that, due to the lapse in time since the original Environment Act Proposal (EAP) was submitted, there is a need for additional NoAs relative to this project such that it can

be executed in a responsible manner. It is understood that the additional NoAs may include: notice for new cooperating farm producers and suitable parcels of land; minimizing of set back distances around residential lots; repeated applications of biosolids in back to back years, accounting for nutrients and metal loading; and revised prescription loading rates based on dry material.

Upon review of this NoA and the Licence, I have decided that the environmental impacts of the proposed new work schedules are insignificant. Accordingly, I hereby approve the proposed new work schedules to complete the work identified in the EAP and the Licence pursuant to the following conditions:

- 1. Any land that was not identified for inclusion with the original EAP that is to be included with upcoming land application of sludge activities, must be identified and land owner agreements provided to the Environmental Approvals Branch (EAB) a minimum of two weeks in advance of any planned land application of sludge;
- 2. Details of any changes in land application methods or locations on identified properties must be submitted to the EAB for Director's approval;
- 3. Details of any plans to include composting of organic materials from the sites of the two lagoons must be submitted to the EAB for approval;
- 4. NoA information submitted subsequent to this letter may result in additional conditions being imposed with possible related fees; and
- 5. This approval shall terminate December 31, 2022.

If you have any questions or would like to discuss these items, please contact Robert Boswick, Environmental Engineer, at 204-945-6030.

Yours truly,

"original signed by"

Tracey Braun, M. Sc. Director Environment Act

 c: Jim Fenske, Greg Elson, and Justin Magne – RM of Springfield Don Labossiere, Director – Environmental Compliance and Enforcement, Manitoba Conservation and Water Stewardship Public Registries