

Environment, Climate and Parks Environmental Approvals Branch 1007 Century St Winnipeg MB R3H 0W4 T 204-945-8321 F 204-945-5229 www.gov.mb.ca/sd

File No. 1071.10

February 25, 2022

Cynthia Wiebe, P.Eng., Manager Engineering Services Wastewater Services Division City of Winnipeg 109-1199 Pacific Avenue Winnipeg MB RE3 3S8 <u>cwiebe@winnipeg.ca</u>

Dear Cynthia Wiebe:

Re: North End Water Pollution Control Centre (NEWPCC) - Environment Act Licence No. 2684 RRR - Response to Assessment of Options to Enhance Interim Phosphorous Reduction

Thank you for the December 29, 2021, letter regarding assessment of options to enhance interim phosphorous reduction at the North End Water Pollution Control Centre (NEWPCC) in accordance with Condition 2 of the May 28, 2021, notice of alteration approval.

There are five stages of phosphorous reduction to be implemented by the City, as defined below:

- Stage 1: Phosphorous reduction with existing infrastructure
- Stage 2: Maximized phosphorous reduction through optimization with existing infrastructure
- Stage 3: Interim phosphorus reduction through additional infrastructure as approved on May 28, 2021
- Stage 4: Enhanced interim phosphorous reduction to as low as the 1.0 mg/L effluent phosphorous limit upon commissioning of the biosolids facility
- Stage 5: Ongoing phosphorous removal meeting the 1.0 mg/L effluent phosphorous limit upon commissioning of the biological nutrient removal facility

To meet the intent of Condition 2 of the May 28, 2021, approval the City of Winnipeg (City) is to describe options for enhancing the interim phosphorous reduction in stage 4 as defined above. Factors to be considered were identified in the September 30, 2020, Interim Phosphorous Reduction Plan and NEWPCC Upgrade Plan Update (section 3.4 on page 12).

The December 29, 2021, letter implies a possible scenario might exist to achieve the 1.0 mg/L phosphorous limit under an assumption that needs to be confirmed by full scale testing. However, it does not identify assessed and selected option(s) or provide any detail or targeted timeline for achieving the limit or undertaking the testing. It does not address the factors previously identified to be considered in the assessment. Therefore, it does not satisfy Condition 2 of the May 28, 2021, notice of alteration approval.

With respect to the assessment of options for Stage 4 enhanced interim phosphorous reduction, the City shall, by March 14, 2022, submit the following:

- 1. a list of actions that were taken between June 28, 2021, and December 29, 2021
- 2. a list of proposed actions to be taken going forward until implementation of enhanced phosphorous reduction
- 3. an update regarding assessment of the factors identified to be considered in the September 30, 2020, report (section 3.4 on page 12) and any other factors that impact the implementation of enhanced interim phosphorous reduction
- 4. the anticipated start and finish date of the full scale trial
- 5. specific best estimates of phosphorous removal at each stage as defined above
- 6. the anticipated date by which the 1.0 mg/L effluent phosphorous limit can be achieved

Updates regarding the above items must be included in the monthly and quarterly reports that are being submitted in accordance with Conditions 6 and 8 of the notice of alteration approval.

As noted in the December 29, 2021, submission, the City is continuing ongoing optimization of interim phosphorous reduction using existing infrastructure (Condition 3 of the May 28, 2021, notice of alteration approval). However, there has been little progress documented in the monthly reports since September 2021. Please ensure that details of optimization activities are included in the monthly and quarterly progress reports.

Should you have any questions regarding this letter, please contact Bereket Assefa, Senior Environmental Engineer, Environmental Approvals Branch, at <u>Bereket.Assefa@gov.mb.ca</u> or 204-330-4613.

Sincerely,

Original Signed By

James Capotosto Director

 Moira Geer, Michelle Paetkau, Colin Javra, Remi Adedapo - City of Winnipeg Kristal Harman, Yvonne Hawryliuk, Nada Suresh - Environmental Compliance and Enforcement Siobhan Burland Ross, Bereket Assefa - Environmental Approvals Public Registry