### SUMMARY OF COMMENTS/RECOMMENDATIONS

**PROPONENT:** Elaine Campbell: Applicant

PROPOSAL NAME: Campbell's Mobile Home Park Wastewater

**Treatment Lagoon** 

CLASS OF DEVELOPMENT: 2

**TYPE OF DEVELOPMENT:** Wastewater Treatment Lagoon

**CLIENT FILE NO.: 1909.10** 

### **OVERVIEW:**

On December 8, 1998, the Department received a Proposal from Allen J. Campbell to expand the wastewater treatment lagoon by constructing a new secondary cell and disposing of treated wastewater on a golf course that is owned by an independent company and located adjacent to the trailer park. The proposal was amended on March 25, 1999. The wastewater treatment lagoon will be located on part of the northeast quarter of Section 33, Township 10, Range 18 WPM. The Proposal indicated that treated wastewater from the lagoon will be discharged onto an adjoining golf course by spray irrigation or discharged via an unnamed drain to the Assiniboine River during the period from May 1 to November 1. The operation wastewater treatment lagoon is currently regulated by Environment Act Licence No. 912. A copy is attached for reference.

The existing wastewater treatment is hydraulically overloaded. The proposal indicates that the proponent wants to expand his mobile home park.

The Department, on May 4, 1999, placed copies of the Proposal in the Public Registries located at 123 Main St. (Union Station); the Centennial Public Library, the Western Manitoba Public Library and provided copies of the Proposal to the Interdepartmental Planning Board and TAC members. As well, the Department placed a public notification of the Proposal in the Brandon Sun on May 8, 1999. The newspaper and TAC notification invited responses until June 1, 1999.

Mr. Campbell has since passed away and his wife, Elaine Verna Campbell, is now the owner of the mobile home park.

### **COMMENTS FROM THE PUBLIC:**

No response was received to the public notification.

# **COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:**

### **Highways**

• No comment.

### **Natural Resources**

• If possible, effluent discharge from the treatment lagoon should be delayed until after the spring run-off period.

## Disposition:

• The proponent has not indicated what the expected ammonia levels will be in the wastewater discharged from the wastewater treatment lagoon. The proponent will not have control of the wastewater once it is released from the wastewater treatment lagoon and it is possible that wastewater will be discharged to the Assiniboine River via a surface drain. Therefore the draft Licence restricts the discharge of wastewater from the wastewater treatment lagoon until after June 15 thus providing time for ammonia reduction to occur in the lagoon.

### **Historic Resources**

No concerns.

## **Rural Development**

- No concerns with respect to the expansion of the lagoon.
- Based on existing ownership, the only area for expansion appears to be northward from the existing park towards the lagoon.
- There would be a concern if the trailer park expansion area came within 1,500 feet of the lagoon.
- The property is zoned Agriculture (AG80) in the Cornwallis Zoning By-law. The applicant will be required to obtain a conditional use approval from the municipality to accommodate the expansion of the wastewater treatment lagoon.

### Disposition:

• The expansion of the lagoon is required to provide adequate treatment of the current wastewater load. The suitability or availability of land for expansion of the trailer park is a land-use issue. The land-use authority in the area is currently reviewing this matter.

#### Health

- The need for fencing, gates and warning signs should be included in the proposal to ensure public safety and control of access.
- Consideration should be given to including the odour nuisance clause.
- Please ensure that any discharge of effluent is in compliance with Manitoba Environment's guidelines.
- Containment design should provide the best possible groundwater protection for the area.
- What is the distance from the lagoon to the new well, located 1 km southeast of the Mobile Home Park, from the drainage channel and earthen storage reservoirs? Is there any risk of it being contaminated in the event of flooding or surface runoff from the channel or reservoirs?
- The type of irrigation should be clarified to better quantify risk to the public and golf course workers.

- Does the golf course need to be issued a separate licence for the irrigation itself? Such a licence should include:
  - irrigation at night when the golf course is not frequented by the public so as to reduce the risk of exposure;
  - posting of signs regarding the nature of the liquid and warning against contact with the liquid contained in the storage reservoirs;
  - appropriate training for groundskeepers and other golf course workers.

## Disposition:

- The draft Licence includes requirements for fencing, warning signs, effluent quality limits, irrigation restrictions and related equipment requirements, and lagoon liner requirements.
- The proponent advised the department that the lagoon is located approximately 2 km from the new well location and approximately 1000 metres from the storage reservoirs located along the drainage channel. Due to the separation distances, the liner requirements and the utilization of nutrients, contamination of the new well site should not occur.
- A licence will not be issued to the operator of the golf course; however, a formal
  agreement will be required between the two parties that indicates the procedures
  that will be followed in the application of the wastewater to the golf course. If
  compliance with the application procedures cannot be ensured, the licence can be
  changed to prohibit the irrigation practice.

### **Environment-Operations Division**

- Soil samples should be done to insure sufficient compaction.
- Wastewater sampling and reporting of laboratory test results should be required prior to discharge.
- Berms of the existing lagoon must be upgraded in order to ensure they are level and of sufficient height to prevent effluent from escaping from the lagoon and surface water from entering the lagoon cell.
- Construction equipment is maintained in a high level to minimize any spills of petroleum products.

#### Disposition:

• The draft Licence includes requirements for effluent sampling and reporting, dyke construction, soil sampling and testing, maximum liquid depth and freeboard.

## **Environment-Water Quality Management**

- Three test holes were bored to determine permeability on site. Is this adequate? Excavation of silt and sand pockets should be a requirement of the Licence.
- The proponent should ensure that the effluent applied to the golf course meets the appropriate water quality objectives for irrigation.
- The proposal requests that the discharge period be lengthened from the present term of May 1 June 30, to the period May 1 September 31. If the discharge period is to be lengthened it should be from June 15 October 31. The longer ice-free period in the spring should reduce the amount of nutrients and other contaminants in the effluent prior to its discharge. A discharge period from June

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15 – October 31 will still coincide closely with the period of time when irrigation of the golf course will be required.

# Disposition:

- It is difficult to determine if 3 test holes were adequate for design purposes. The draft Licence stipulates the requirements for the clay lining and the post-construction soil sampling and testing.
- The draft Licence includes effluent quality requirements and effluent sampling and reporting requirements.
- The draft Licence restricts the discharge to the period from June 15 November 1.
   This change is to address concern about the impact of ammonia in the wastewater that may be discharged via the unnamed drainage channel to the Assiniboine River.
   The longer storage period will reduce the amount of ammonia in the wastewater however it will not reduce the nutrient levels.

## **Canadian Environmental Assessment Agency**

• The application of the Canadian Environmental Assessment Act with respect to this proposal will not be required.

### **PUBLIC HEARING:**

A public hearing is not required.

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# **RECOMMENDATION:**

A Licence should be issued in accordance with the attached draft. Enforcement of the Licence should be assigned to the Approvals Branch until the soil testing has been completed.

Attachment: copy of Environment Act Licence No. 912

PREPARED BY:

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