#### SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPONENT:

Lake of the Prairies Development Ltd.

NAME OF DEVELOPMENT:

Pyott's West Campground

CLASS OF DEVELOPMENT: TYPE OF DEVELOPMENT:

Two
Multi Purpose Resort

CLIENT FILE NO.:

4760.00

# **OVERVIEW:**

The Proposal was received on February 25, 2002. It was dated February 25, 2002. The advertisement of the proposal was as follows:

"A Proposal has been filed by Boma Environmental and Safety Inc. on behalf of Lake of the Prairies Development Inc. for the construction and operation of a wastewater treatment lagoon for Pyott's West Campground in SW 3-25-29W. The lagoon would treat wastewater originating in the campground, and would evaporate treated wastewater during the open water season. Wastewater would be transferred from holding tanks in the campground to the lagoon by truck. Construction is proposed for the spring of 2002."

The Proposal was advertised in the Roblin Review and the Russell Banner on Tuesday, April 2, 2002. It was placed in the Main, Centennial and Eco-Network public registries, and in the offices of the rural municipalities of Shell River and Shellmouth-Boulton. The Proposal was distributed to TAC members on March 25, 2002. The closing date for comments from members of the public and TAC members was April 25, 2002.

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

No public comments were received.

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

<u>Manitoba Conservation – Sustainable Resource Management</u> Although the proponent has stated that evaporation exceeds precipitation by about 80mm per year the built in contingency of the evaporative holding pond may not be adequate. Chances of heavy rainfall events causing the capacity of the evaporative pond to be exceeded may increase in the future. The proponent should have looked at a situation where the precipitation exceeds evaporation over a number of years. The proponent has not provided a contingency plan to be used in the event of a capacity problem.

The location of the well in relation to the proposed wastewater system is not evident. It would be prudent to ensure that the well is not located directly down-gradient and that in the event of an overflow the effluent would not pass near any well heads.

Actions should be taken to ensure that nitrate levels, which are already relatively high, do not increase as a result of the proposed development.

The existing sewage holding pond was constructed without the formal approval of Environment Act licensing. The integrity and ability of this cell to meet the minimum standard should be demonstrated. Visual inspection has indicated that the synthetic liner used in the construction of this holding pond may be insufficient as an impermeable barrier. Plans should be considered to construct and operate the proposed cell as a primary cell while reworking the existing cell to meet minimum standard.

It is indicated in the proposal that 115 seasonal lots are serviced by a DOT approved HDPE sewage holding tank. This DOT standard should be provided so it can be compared to the B66 standard required by the Private Sewage Disposal Systems Regulation MR95/88R. Any additional sewage holding tanks must be registered and meet the minimum requirements of MR95/88R.

It is incumbent on this development to meet minimum standards as defined by regulation. Understanding the financial impact to the developers to upgrade all holding tanks at one time, an alternative to meeting compliance may be in the form of a phased action plan with a detailed replacement of noncompliance sewage holding tanks over a three year period.

The proponent should be required to actively participate in any future watershed based management study, plan/or nutrient reduction program, approved by the Director, for the Lake of the Prairies, Assiniboine River and associated waterways and watersheds.

Disposition:

Additional information was requested to address these comments.

**Environmental Approvals Branch** A number of concerns were noted in reviewing the project:

- 1. Information is required on the existing single cell lagoon drawings showing construction details, liner details, the truck dumping station details and the location of the lagoon relative to property lines, Lake of the Prairies, the nearest residence, and roads.
- 2. Dyke slopes should be 4:1, with a top width of 3.0m.
- 3. Additional information should be provided concerning the hydraulic and organic loading of the lagoon.
- 4. A contingency plan should be in place for hydraulic overloading if evaporation is inadequate, a surface discharge or hauling would be needed.
- 5. A plan to address sludge accumulation in the lagoon is needed.
- 6. Information on the installation of the lagoon liner is needed anchoring, seams, and quality control.
- 7. Existing sewage holding tanks in the trailer campground are inadequate –too small and not approved for this use.
- 8. The campground's waste disposal ground and water supply system must be operated in compliance with regulatory requirements.

Disposition:

Additional information was requested to address these comments.

Historic Resources Branch No concerns.

Mines Branch The Crown owns the sand and gravel rights within SW 3-25-29W. There is a valley terrace deposit consisting predominantly of sand and gravel located in the south half of the section. (See Map No. AR 85-4 for reference.) The surficial geology map was prepared by UMA for Manitoba Energy and Mines in 1985. The map depicts the surficial geology of this locality. There appears to be an administrative error concerning the location of the campground as noted on the Crown land permit. An airphoto shows that the campground is located in SE 3-25-29W whereas the permit indicates that the campground is located in the southwest quarter.

Highway Planning and Design Branch No concerns.

Medical Officer of Health – Parkland RHA As the existing sewage holding cell will continue to be used as the primary cell, its integrity should be reviewed to ensure that it meets engineering and environmental standards. Site inspections should be conducted during the construction of the new sewage holding pond to ensure that it is constructed in such a manner as to protect groundwater and surface water. As the water supply for Pyott's West Campground is a public water system, it is subject to disinfection, chlorine residual testing and water sampling for analysis as per MR 330/88R "Water Supplies Regulation" of The Public Health Act.

Disposition:

Additional information was requested concerning the existing cell. The remaining comments can be addressed as licence conditions.

<u>Canadian Environmental Assessment Agency</u> The application of the Canadian Environmental Assessment Act will not be required. The Department of Fisheries and Oceans have offered to provide specialist advice. (No federal agencies indicated a desire to participate in the provincial review of the project.)

## **ADDITIONAL INFORMATION:**

Additional information addressing TAC comments was requested from the Proponent's consultant on May 16, 2002. A response dated January 25, 2003 was received on January 31, 2003. Further additional information was requested on February 11, 2003. A response to this request dated May 1, 2003 was received on May 2, 2003. Two additional items were requested on May 5, 2003. A sketch of the operation's existing layout and facilities was provided on May 12, 2003, but design details for the wastewater treatment facilities were not provided. Following additional discussion between the Proponent and consultants, a decision was made to install a wastewater holding tank and to truck the wastewater to the licenced treatment facility owned by the Town of Roblin. Notification of this alteration was dated September 10, 2003, and was received by fax on September 12, 2003.

## **PUBLIC HEARING:**

As no public concerns were identified, a public hearing is not recommended.

## DISCUSSION:

The Proponent has agreed to replace wastewater holding tanks at campsites with CSA

approved tanks.

• Following the installation of a large CSA approved holding tank to collect truck hauled wastewater from the individual site holding tanks, the previously existing wastewater holding facility was decommissioned in the summer of 2003 as requested by regional staff.

• Regional staff has indicated that the operation of the campground's waste disposal

ground is generally satisfactory.

In view of these items, most environmental concerns about the campground facilities and operation have been addressed. Remaining concerns can be addressed through licence conditions.

## **RECOMMENDATION:**

It is recommended that the Development be licensed under The Environment Act subject to the limits, terms and conditions as described on the attached Draft Environment Act Licence. It is further recommended that enforcement of the Licence be assigned to the Western Region.

#### PREPARED BY:

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