

## **SUMMARY OF COMMENTS/RECOMMENDATIONS**

**PROPONENT:** Rural Municipality of Victoria

**PROPOSAL NAME:** Rural Municipality of Victoria - Holland  
Wastewater Treatment Lagoon

**CLASS OF DEVELOPMENT:** Two

**TYPE OF DEVELOPMENT:** Waste treatment and storage – wastewater  
treatment lagoons

**CLIENT FILE NO.:** 153.20

### **OVERVIEW**

The Proposal was received on March 29, 2017. It was dated March 23, 2017. The advertisement of the Proposal was as follows:

“JR Cousin Consultants Ltd. has filed an Environment Act Proposal on behalf of the Rural Municipality of Victoria for the construction and operation of a wastewater treatment lagoon serving the community of Holland. The facility would be located in NE 26-7-11 W, immediately south of PTH 2 and approximately 2 km east of Holland. It would consist of one primary and one secondary cell. Discharges of treated effluent would be made between June 15 and October 31 to a drain running north of the facility which eventually leads to the Cypress River. Construction of the facility is proposed for 2018. Following construction, the existing facility in NW 27-7-11 W would be decommissioned.”

The Proposal was advertised in the Treherne Times on Monday, April 20, 2017. It was placed in the following public registries:

- Legislative Library (Winnipeg)
- Millennium Public Library (Winnipeg)
- Online: <http://www.gov.mb.ca/sd/eal/registries/153.2holland/index.html>

The Proposal was distributed to Technical Advisory Committee (TAC) members on April 20, 2017.

The closing date for comments from members of the public and TAC members was May 20, 2017.

### **COMMENTS FROM THE PUBLIC**

No public comments were received on the Proposal.

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

Technical Advisory Committee (TAC) responses are summarized in Table 1 below. Substantive comments and their dispositions follow the table. TAC comments are provided in full in the public registries.

Table 1 Rural Municipality of Victoria - Holland Wastewater Treatment Lagoon Technical Advisory Committee Comments

<b>No</b>	<b>Technical Advisory Committee Member</b>	<b>Response Provided</b>
1	Canadian Environmental Assessment Agency	No response
2	Manitoba Agriculture – Land Use Branch	No response
3	Manitoba Sustainable Development –	
	Environmental Compliance and Enforcement Branch	No comment
	Climate Change and Air Quality Branch	No response
	Wildlife and Fisheries Branch	No wildlife concerns
	Parks and Protected Spaces Branch	No response
	Forestry Branch	No response
	Indigenous Relations Branch	No response
	Lands Branch	No concerns/comments
	Water Science and Management Branch:	
	Water Quality Management Section	No response
	Groundwater Management Section	May 4, 2017
	Office of Drinking Water	No concerns
	Water Use Licensing Section	No concerns
	Water Control Works and Drainage Licensing Section	No response
	Central Region Integrated Resource Management Team	No response
4	Manitoba Sport, Culture, and Heritage – Heritage Branch	No response
5	Manitoba Growth, Enterprise and Trade –	
	Energy Development Branch	No response
	Petroleum Branch	No response
	Office of the Fire Commissioner	No comments or concerns
	Workplace Safety and Health	No response
6	Manitoba Infrastructure – Highway Planning and Design Branch	No response
7	Manitoba Indigenous and Municipal Relations	April 24, 2017
8	Manitoba Health, Seniors and Active Living – Environmental Health Unit	No response

**Manitoba Sustainable Development – Water Science and Watershed Management Branch, Groundwater Management Section**

In response to your request for comments on the EA Proposal for the Holland Wastewater Treatment Lagoon, the Groundwater Management Section is pleased to provide the following as it relates to the department EAP guidelines:

Information Bulletin – Environment Act Proposal Report Guidelines (December 2015)

The guidelines prescribe the following information:

**Description of Existing Environment in the Project Area**

- The biophysical environment as related to the development, including topographic and base maps and aerial photographs as necessary, as follows:
  - ... description of the regional groundwater conditions including aquifers, recharge areas, quality, wells, etc;

The EAP provides information on the geotechnical characteristics of the proposed lagoon site. However there is little information provided on the hydrogeology of the proposed site. For example, there is no description of the aquifer system (such as aquifer type and expected depth, aquitards, groundwater flow direction) or information on nearby groundwater users (such as Holland’s municipal water supply wells or private water wells).

**Description of Environmental and Human Health Effects of the Proposed Development**

- Potential impacts of the development on the environment, including, but not necessarily limited to:
  - impact on biophysical environment, including wildlife, fisheries, surface water, groundwater, and forestry resources

The EAP (under Groundwater in section 3.1.2) states “There is a potential for groundwater impacts if wastewater leaks/seeps through the lagoon liner or forcemain pipe and into the groundwater below.” However, the type of groundwater impacts and degree of risk on the local groundwater are not described.

- Potential impacts of the development on human health and safety, including, but not necessarily limited to:
  - potential impact on human health and safety resulting from any release of pollutants, including a human health risk assessment.

As per section 3.1.2 of the EAP, if there is a potential for groundwater impacts as a result of wastewater leakage/seepage then the potential impact on human health and safety resulting from any release of pollutants should be examined.

### Mitigation Measures and Residual Environmental Effects

The EAP (under Groundwater in section 4.2 Mitigation of Impacts to Water) states “Seepage of effluent from the lagoon is unlikely to affect groundwater as the proposed lagoon cells would utilize a reworked soil liner, having a minimum thickness of 1.0 m and a hydraulic conductivity of  $1 \times 10^{-7}$  cm/sec or less, as required by Manitoba Sustainable Development. ” However, even at this design criteria small amounts of effluent are expected to seep from the lagoon. The potential for impact to the local aquifer will also depend on the natural soils (type and thickness) separating the lagoon and any underlying aquifer. Any potential impact should be assessed as per the Information Bulletin – Design Objectives for Wastewater Treatment Lagoons below.

#### Information Bulletin – Design Objectives for Wastewater Treatment Lagoons (September 2014)

More specifically the following information under items 2. d) and 3.2 c) is required.

Manitoba Sustainable Development Guideline	Action Required for EAP
<p><b>2. Location</b></p> <p><b>d) Groundwater Pollution:</b> Proximity of lagoons to water supplies and other facilities subject to contamination and location in areas of porous soils and fissured rock formations should be critically evaluated to avoid creation of health hazards or other undesirable conditions. The possibility of chemical pollution should merit appropriate consideration.</p>	<p>The hydrogeology of the proposed site and proximity of the lagoon to water supplies and other facilities need to be examined/critically evaluated based on the proposed lagoon design to assess the risk of contamination to any underlying aquifer and nearby groundwater users/facilities.</p>
<p><b>3.2 Lagoon Bottom</b></p> <p><b>c) Soil Formation:</b> The soil formation or structure of the cell bottoms should be relatively tight to avoid excessive liquid loss due to percolation or seepage. The minimum hydraulic conductivity for use of in-situ soils is <math>1 \times 10^{-7}</math> cm/s. Soil borings and tests to determine the characteristics of surface soil and subsoil shall be made a part of preliminary surveys to select lagoon sites. Gravel and limestone areas and areas with high water tables will require additional design considerations.</p>	<p>Based on the results of 2. d) above, determine the need for any additional design considerations. For example, although the soil liner for a lagoon may meet the provincial requirements for permeability, if an underlying aquifer is not adequately protected by the thickness/type of soil separating the lagoon and aquifer there may be a risk for seepage/leakage of contamination from the lagoon into the aquifer and subsequent impact on nearby groundwater users.</p>

Disposition:

Additional information was requested to address the proximity of the project to potential features subject to contamination. Other comments can be addressed through licence conditions.

**Manitoba Indigenous and Municipal Relations - Community and Regional Planning Branch**

The site of the proposed Holland Wastewater Treatment Lagoon is zoned “AG” Agricultural General Zone in the R.M. of Victoria Zoning By-Law No. 1266/2005. Sewage lagoons are a Conditional Use in this zone. Subdivision approval is required to obtain title to the proposed lot. Approval is also required from the Highway Traffic Board to change the existing field crossing onto PTH 2 and for the construction of the access road within the 125 feet control area of PTH 2.

Disposition:

This information was provided to the consultant.

**ADDITIONAL INFORMATION**

Additional information to address Technical Advisory Committee comments was requested on May 24, 2017. A response was received on June 6, 2017. The response satisfactorily addressed the comments. Licence conditions can be provided to address any remaining issues.

**PUBLIC HEARING**

As no requests were received for a public hearing, a public hearing is not recommended.

**CROWN-INDIGENOUS CONSULTATION**

The Government of Manitoba recognizes it has a duty to consult in a meaningful way with Indigenous communities when any proposed provincial law, regulation, decision or action may infringe upon or adversely affect the exercise of the Indigenous rights of that community.

The proposal involves the construction and operation of a new wastewater treatment lagoon system for municipal purposes on privately owned agricultural land to be purchased by the proponent. Since resource use is not affected by the project, it is concluded that Crown-Indigenous consultation is not required for the project.

**RECOMMENDATION**

All comments received have been addressed through additional information or through licence conditions. 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.

Administration of the Licence should be assigned to the Central Region of the Environmental Compliance and Enforcement Branch. Responsibility for liner inspection and record drawings should be retained by the Environmental Approvals Branch until construction of the wastewater treatment lagoon expansion is completed.

Decommissioning of the existing facility will be conducted under a separate Environment Act Proposal for biosolids application to agricultural land. The existing facility is licensed under Licence No. 731VO. This licence may be cancelled once decommissioning is complete.

PREPARED BY:

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August 15, 2017

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