



November 6, 2020

Shannon Kohler  
Director  
Environmental Approvals  
1007 Century Street  
Winnipeg, MB R3H 0W4

Dear Ms. Kohler:

**Subject: Total Phosphorus Sampling and Monitoring Program – Fall Results  
Environment Act Licence No. 3019**

On behalf of our client, Brightstone Colony, we are submitting the fall results of the total phosphorus sampling and monitoring program as it pertains to the following documents:

- Environment Act Licence (EAL) No. 3019, dated October 1, 2012.
- Notice of Alteration (submitted January 24, 2014, by WSP) regarding a total phosphorus sampling and monitoring program along the lagoon discharge route.
- Response from Manitoba Conservation and Water Stewardship (March 11, 2014) approving a one-year trial and removing the requirements of Clause 22e of EAL No. 3019.
- Extension request (submitted June 26, 2020, by WSP) requesting an extension to the removal of the requirements of Clause 22e of EAL No. 3019.
- Total Phosphorus Sampling and Monitoring Program – Spring Results (July 10, 2020). Please note that the subject line of this document was incorrectly labelled as *Extension Request for the Removal of the Requirements of Clause 22e of Environment Act Licence No. 3019*.

As outlined in the March 11, 2014 document from Manitoba Conservation and Water Stewardship (noted above), the total phosphorus (TP) sampling and monitoring program is to be conducted along the discharge route at each of the three proposed monitoring locations (see [Figure 1](#)). Samples are to be collected three times during each of the first two discharge events (start, mid-point, and end of the discharge). The first discharge event occurred over the period from June 23 and July 7, 2020, and the results are documented in the July 10, 2020 document referenced above.

#### [Fall Discharge Sampling and Results](#)

Lagoon pre-discharge testing (in cell) was conducted on September 23, 2020, with a resulting TP level of 2.78 mg/L (see attached ALS Lab Work Order # L2507994). Additionally, pre-discharge samples were taken along the discharge route in each of the three specified areas to document the initial conditions. These pre-discharge results met the TP limits of the EAL. After receiving approval from the local Environment Officer, discharge commenced on October 19, 2020 and took place over a 10-day period ending on October 29, 2020. [Table 1](#) on the following page indicates the dates and results for each of the TP samples collected and their corresponding ALS Lab Work Order Nos. (which are attached).

Two results during the sampling were above the EAL limit of 1.0 mg/L, but we have concluded that these results are anomalies. Regarding the first exceedance, it occurred near the mid-point of the discharge for a sample taken in Area 3 on October 22, 2020. From a discussion with our client, it was noted that at the time of sample acquisition, it contained a significant amount of soil sediment, which seemingly impacted the test result of 11.2 mg/L. Additional justification that this result was not an accurate representation of the lagoon discharge in Area 3 comes is found in the end-of-discharge sample taken on October 28, 2020, with a total phosphorus value of 0.696 mg/L. It is believed that this final test result is a true reflection of the lagoon discharge effluent in this area.



Image © 2020 CNES / Airbus

**Figure 1: Sampling Locations**

Regarding the second exceedance, it occurred during the end-of-discharge sample in Area 2. When considered with the data from the other two samples for Area 1 (0.770 mg/L) and Area 3 (0.696 mg/L), it is indicative that an outside influence led to the exceedance. This sample is understood to be unrepresentative of the actual treatment occurring along the discharge route. Nonetheless, the Area 3 result met the TP limit, which is recognized as the overriding factor in this discussion.

**Table 1: Sampling results**

Sample Date	Area 1	Area 2	Area 3
	5577613 N 694276 E	5577824 N 694238 E	5578513 N 694211 E
23-Sep-2020 (ALS #L2508217)	1.00 mg/L	0.748 mg/L	0.442 mg/L
19-Oct-2020 (ALS #L2518747)	0.858 mg/L	0.551 mg/L	0.958 mg/L
22-Oct-2020 (ALS #L2520738)	0.833 mg/L	0.989 mg/L	11.2 mg/L
28-Oct-2020 (ALS #L2523107)	0.770 mg/L	1.52 mg/L	0.696 mg/L



As evidenced by the laboratory results from the spring discharge and now confirmed with results from the fall discharge, the combination of the naturalized wetland area and vegetated ditch have proven to be an effective agent in phosphorus reduction. As such, we request an EAL revision for the permanent removal of the requirement to meet a 1.0 mg/L TP limit within the secondary cell of the Brightstone Colony lagoon prior to discharge.

We would welcome further discussion on the matter and otherwise request an opportunity to review a draft of the changes proposed in the amended licence prior to it being finalized. We look forward to your response. If you have any questions or require additional information, please contact the undersigned.

Kind regards,

WSP Canada Inc.



Jason B  
Engineer, Water and Wastewater Infrastructure

encl.

cc: Bruce Webb – Conservation and Climate  
Peter Waldner – Brightstone Colony  
Joseph Waldner – Brightstone Colony



Brightstone Colony  
ATTN: JOSEPH WALDNER  
General Delivery  
Lac du Bonnet MB R0E 1A0

Date Received: 24-SEP-20  
Report Date: 01-OCT-20 11:24 (MT)  
Version: FINAL

Client Phone: 204-345-2526

## Certificate of Analysis

Lab Work Order #: L2507994  
Project P.O. #: NOT SUBMITTED  
Job Reference:  
C of C Numbers:  
Legal Site Desc:

[Redacted Signature]

Hua Wo  
Chemistry Laboratory Manager

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## ALS ENVIRONMENTAL ANALYTICAL REPORT

Sample Details/Parameters	Result	Qualifier*	D.L.	Units	Extracted	Analyzed	Batch
L2507994-1 BRIGHTSTONE COLONY Sampled By: CLIENT on 23-SEP-20 @ 20:00 Matrix: <b>Miscellaneous Parameters</b> Biochemical Oxygen Demand BOD Carbonaceous Phosphorus (P)-Total Total Suspended Solids	    17.3 12.2 2.78 17.4	                	    6.0 2.0 0.030 3.0	    mg/L mg/L mg/L mg/L	                	    25-SEP-20 25-SEP-20 28-SEP-20 28-SEP-20	    R5243146 R5243146 R5241526 R5242323
L2507994-2 FECAL COLIFORMS #1 S Sampled By: CLIENT on 23-SEP-20 @ 20:00 Matrix: <b>Miscellaneous Parameters</b> Fecal Coliforms	   411	      	   1	   MPN/100mL	      	   24-SEP-20	   R5236313
L2507994-3 FECAL COLIFORMS #2 N Sampled By: CLIENT on 23-SEP-20 @ 20:00 Matrix: <b>Miscellaneous Parameters</b> Fecal Coliforms	   225	      	   1	   MPN/100mL	      	   24-SEP-20	   R5236313
L2507994-4 FECAL COLIFORMS #3 W Sampled By: CLIENT on 23-SEP-20 @ 20:00 Matrix: <b>Miscellaneous Parameters</b> Fecal Coliforms	   240	      	   1	   MPN/100mL	      	   24-SEP-20	   R5236313

\* Refer to Referenced Information for Qualifiers (if any) and Methodology.

## Reference Information

### Test Method References:

ALS Test Code	Matrix	Test Description	Method Reference**
BOD-CBOD-WP	Water	Carbonaceous BOD	APHA 5210 B
Samples are diluted and seeded, have TCMP added to inhibit nitrogenous demands, and then are incubated in airtight bottles at 20°C for 5 days. Dissolved oxygen is measured initially and after incubation, and results are computed from the difference between initial and final DO.			
BOD-WP	Water	Biochemical Oxygen Demand (BOD)	APHA 5210 B
Samples are diluted and seeded and then incubated in airtight bottles at 20°C for 5 days. Dissolved oxygen is measured initially and after incubation, and results are computed from the difference between initial and final DO.			
EC-SCREEN-WP	Water	Conductivity Screen (Internal Use Only)	APHA 2510
Qualitative analysis of conductivity where required during preparation of other test eg. IC, TDS, TSS, etc			
FC-QT97-WP	Water	Fecal Coliform by MPN QT97	APHA 9223B QT97
This analysis is carried out using procedures adapted from APHA Method 9223B "Enzyme Substrate Coliform Test". The sample is mixed with a mixture of hydrolyzable substrates and then sealed in a 97-well packet. The packet is incubated at 44.5 +/- 0.2 degrees C for 18 hours and then the number of wells exhibiting a positive response are counted. The final result is obtained by comparing the number of positive responses to a probability table.			
P-T-COL-WP	Water	Phosphorus, Total	APHA 4500 P PHOSPHORUS-L
This analysis is carried out using procedures adapted from APHA METHOD 4500-P "Phosphorus". Total Phosphorus is determined colourmetrically after persulphate digestion of the sample.			
SOLIDS-TOTSUS-WP	Water	Total Suspended Solids	APHA 2540 D (modified)
Total suspended solids in aqueous matrices is determined gravimetrically after drying the residue at 103 105°C.			

\*\* ALS test methods may incorporate modifications from specified reference methods to improve performance.

*The last two letters of the above test code(s) indicate the laboratory that performed analytical analysis for that test. Refer to the list below:*

Laboratory Definition Code	Laboratory Location
WP	ALS ENVIRONMENTAL - WINNIPEG, MANITOBA, CANADA

### Chain of Custody Numbers:

### GLOSSARY OF REPORT TERMS

Surrogates are compounds that are similar in behaviour to target analyte(s), but that do not normally occur in environmental samples. For applicable tests, surrogates are added to samples prior to analysis as a check on recovery. In reports that display the D.L. column, laboratory objectives for surrogates are listed there.

mg/kg - milligrams per kilogram based on dry weight of sample  
 mg/kg wwt - milligrams per kilogram based on wet weight of sample  
 mg/kg lwt - milligrams per kilogram based on lipid-adjusted weight  
 mg/L - unit of concentration based on volume, parts per million.

< - Less than.

D.L. - The reporting limit.

N/A - Result not available. Refer to qualifier code and definition for explanation.

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## Quality Control Report

Workorder: L2507994

Report Date: 01-OCT-20

Page 1 of 2

Client: Brightstone Colony  
 General Delivery  
 Lac du Bonnet MB R0E 1A0  
 Contact: JOSEPH WALDNER

Test	Matrix	Reference	Result	Qualifier	Units	RPD	Limit	Analyzed
<b>BOD-CBOD-WP</b>								
	<b>Water</b>							
Batch	R5243146							
<b>WG3412180-2</b>	<b>LCS</b>							
BOD Carbonaceous			107.1		%		85-115	25-SEP-20
<b>WG3412180-1</b>	<b>MB</b>							
BOD Carbonaceous			<2.0		mg/L		2	25-SEP-20
<b>BOD-WP</b>								
	<b>Water</b>							
Batch	R5243146							
<b>WG3412180-2</b>	<b>LCS</b>							
Biochemical Oxygen Demand			105.3		%		85-115	25-SEP-20
<b>WG3412180-1</b>	<b>MB</b>							
Biochemical Oxygen Demand			<2.0		mg/L		2	25-SEP-20
<b>FC-QT97-WP</b>								
	<b>Water</b>							
Batch	R5236313							
<b>WG3411862-1</b>	<b>MB</b>							
Fecal Coliforms			<1		MPN/100mL		1	24-SEP-20
<b>P-T-COL-WP</b>								
	<b>Water</b>							
Batch	R5241526							
<b>WG3413485-22</b>	<b>LCS</b>							
Phosphorus (P)-Total			97.9		%		80-120	28-SEP-20
<b>WG3413485-21</b>	<b>MB</b>							
Phosphorus (P)-Total			<0.0030		mg/L		0.003	28-SEP-20
<b>SOLIDS-TOTSUS-WP</b>								
	<b>Water</b>							
Batch	R5242323							
<b>WG3413543-2</b>	<b>LCS</b>							
Total Suspended Solids			101.7		%		85-115	28-SEP-20
<b>WG3413543-1</b>	<b>MB</b>							
Total Suspended Solids			<3.0		mg/L		3	28-SEP-20

# Quality Control Report

Workorder: L2507994

Report Date: 01-OCT-20

Page 2 of 2

## Legend:

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Limit	ALS Control Limit (Data Quality Objectives)
DUP	Duplicate
RPD	Relative Percent Difference
N/A	Not Available
LCS	Laboratory Control Sample
SRM	Standard Reference Material
MS	Matrix Spike
MSD	Matrix Spike Duplicate
ADE	Average Desorption Efficiency
MB	Method Blank
IRM	Internal Reference Material
CRM	Certified Reference Material
CCV	Continuing Calibration Verification
CVS	Calibration Verification Standard
LCSD	Laboratory Control Sample Duplicate

## Hold Time Exceedances:

All test results reported with this submission were conducted within ALS recommended hold times.

ALS recommended hold times may vary by province. They are assigned to meet known provincial and/or federal government requirements. In the absence of regulatory hold times, ALS establishes recommendations based on guidelines published by the US EPA, APHA Standard Methods, or Environment Canada (where available). For more information, please contact ALS.

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The ALS Quality Control Report is provided to ALS clients upon request. ALS includes comprehensive QC checks with every analysis to ensure our high standards of quality are met. Each QC result has a known or expected target value, which is compared against pre-determined data quality objectives to provide confidence in the accuracy of associated test results.

Please note that this report may contain QC results from anonymous Sample Duplicates and Matrix Spikes that do not originate from this Work Order.





Brightstone Colony  
ATTN: JOSEPH WALDER  
General Delivery  
Lac du Bonnet MB ROE 1A0

Date Received: 24-SEP-20  
Report Date: 29-SEP-20 09:45 (MT)  
Version: FINAL

Client Phone: 204-345-2526

## Certificate of Analysis

Lab Work Order #: L2508217  
Project P.O. #: NOT SUBMITTED  
Job Reference:  
C of C Numbers:  
Legal Site Desc:



Samantha Kee  
Account Manager

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## Reference Information

**Test Method References:**

ALS Test Code	Matrix	Test Description	Method Reference**
P-T-COL-WP	Water	Phosphorus, Total	APHA 4500 P PHOSPHORUS-L

This analysis is carried out using procedures adapted from APHA METHOD 4500-P "Phosphorus". Total Phosphorus is determined colourmetrically after persulphate digestion of the sample.

\*\* ALS test methods may incorporate modifications from specified reference methods to improve performance.

*The last two letters of the above test code(s) indicate the laboratory that performed analytical analysis for that test. Refer to the list below:*

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**Chain of Custody Numbers:**
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Brightstone Colony  
ATTN: JOSEPH WALDNER  
General Delivery  
Lac du Bonnet MB R0E 1A0

Date Received: 20-OCT-20  
Report Date: 23-OCT-20 12:35 (MT)  
Version: FINAL

Client Phone: 204-345-2526

## Certificate of Analysis

Lab Work Order #: L2518747  
Project P.O. #: NOT SUBMITTED  
Job Reference: BRIGHTSTONE COLONY  
C of C Numbers:  
Legal Site Desc:



Kianna Brown  
Account Manager

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## Reference Information

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ALS Test Code	Matrix	Test Description	Method Reference**
P-T-COL-WP	Water	Phosphorus, Total	APHA 4500 P PHOSPHORUS-L

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Brightstone Colony  
ATTN: JOSEPH WALDNER  
General Delivery  
Lac du Bonnet MB R0E 1A0

Date Received: 23-OCT-20  
Report Date: 28-OCT-20 12:37 (MT)  
Version: FINAL

Client Phone: 204-345-2526

## Certificate of Analysis

Lab Work Order #: L2520738  
Project P.O. #: NOT SUBMITTED  
Job Reference: BRIGHTSTONE COLONY  
C of C Numbers:  
Legal Site Desc:



Hua Wo  
Chemistry Laboratory Manager

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## Reference Information

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P-T-COL-WP	Water	Phosphorus, Total	APHA 4500 P PHOSPHORUS-L

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# Quality Control Report

Workorder: L2520738

Report Date: 28-OCT-20

Page 1 of 2

Client: Brightstone Colony  
General Delivery  
Lac du Bonnet MB R0E 1A0  
Contact: JOSEPH WALDNER

Test	Matrix	Reference	Result	Qualifier	Units	RPD	Limit	Analyzed
<b>P-T-COL-WP</b>	<b>Water</b>							
<b>Batch</b>	<b>R5270207</b>							
<b>WG3433644-22 LCS</b>								
Phosphorus (P)-Total			95.0		%		80-120	28-OCT-20
<b>WG3433644-21 MB</b>								
Phosphorus (P)-Total			<0.0030		mg/L		0.003	28-OCT-20

# Quality Control Report

Workorder: L2520738

Report Date: 28-OCT-20

Page 2 of 2

## Legend:

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Limit	ALS Control Limit (Data Quality Objectives)
DUP	Duplicate
RPD	Relative Percent Difference
N/A	Not Available
LCS	Laboratory Control Sample
SRM	Standard Reference Material
MS	Matrix Spike
MSD	Matrix Spike Duplicate
ADE	Average Desorption Efficiency
MB	Method Blank
IRM	Internal Reference Material
CRM	Certified Reference Material
CCV	Continuing Calibration Verification
CVS	Calibration Verification Standard
LCSD	Laboratory Control Sample Duplicate

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Brightstone Colony  
ATTN: JOSEPH WALDNER  
General Delivery  
Lac du Bonnet MB R0E 1A0

Date Received: 29-OCT-20  
Report Date: 03-NOV-20 13:45 (MT)  
Version: FINAL

Client Phone: 204-345-2526

## Certificate of Analysis

Lab Work Order #: L2523107  
Project P.O. #: NOT SUBMITTED  
Job Reference: BRIGHTSTONE  
C of C Numbers:  
Legal Site Desc:



Samantha Kee  
Account Manager

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## Reference Information

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12 - 1329 Niakwa Rd. E.  
 Winnipeg, Manitoba R2J 3T4  
 Tel: (204) 255-9720  
 Fax: (204) 255-9721  
 Toll Free: 1 800 607 7555

Ch   
 L2523107-COFC

**FOR LABORATORY USE ONLY (SHADED AREAS)**

Sample Condition Upon Receipt:  ACCEPTABLE  NON ACCEPTABLE  
 Frozen  Cold  Ambient  Broken  Leakage  Incorrect Sample Container

DATE RECEIVED: Oct 29  
 TIME RECEIVED: 9:50 AM  
 BY: DJ TEMP: 6.7°C

COMMENT: Q Oct 29 10WA

Date Sampled: Oct 28 Time: 6:00 A.M.  P.M.  Date Required: \_\_\_\_\_

Location: BRIGHTSTONE  
 (Town, Community, City) Submitter's Name Printed: \_\_\_\_\_

Community Code Number: \_\_\_\_\_ Rural Municipality/LGC/UVD: \_\_\_\_\_

**SAMPLE TYPE**

**DRINKING WATER**

- Untreated Well
- Treated Well
- Treated Municipal
- Non-Treated Municipal
- Water-Surface-Raw
- Water-Surface-Treated

**PLEASE PRINT & PRESS FIRMLY**

**NON-DRINKING WATER**

- Sewage/Waste Water
- Lake/River
- Swimming Pool
- Whirl Pool
- Other: \_\_\_\_\_

**NOTES & CONDITIONS**

1. Quote number **MUST BE** provided to insure proper pricing.
2. Failure to properly complete all portions of this form may delay analysis.
3. ALS's liability limited to cost of analysis.

**SERVICE REQUESTED**

- REGULAR  PRIORITY (50% SURCHARGE)
- EMERGENCY (100% SURCHARGE)
- SAME DAY (200% SURCHARGE)

PURPOSE OF TEST  
 Private  Real Estate  Water Main

LAB NUMBER	SAMPLE IDENTIFICATION	ALS CUSTOMER #:	QUOTE #:
	Phosphorus #1	<b>REPORT TO BE SENT TO</b> NAME: <u>JOSEPH WALDNER</u> COMPANY: <u>BRIGHTSTONE COLONY</u> ADDRESS: _____ CITY/TOWN: <u>LAC DU BONNET</u> / PROV.: <u>MB</u> POSTAL CODE: <u>R0E-1A0</u> PHONE: <u>1-204-803-0234</u> BY: MAIL <input type="checkbox"/> FAX <input type="checkbox"/> E-MAIL <input checked="" type="checkbox"/> <u>JOSEFWALD@gmail.com</u> <small>(FAX NUMBER)</small> <small>(EMAIL ADDRESS)</small>	
	Phosphorus #2		
	Phosphorus #3		
		CC NAME: _____ ADDRESS: _____ CITY/TOWN: _____ / PROV.: _____ POSTAL CODE: _____ PHONE: _____ BY: MAIL <input type="checkbox"/> FAX <input type="checkbox"/> E-MAIL <input type="checkbox"/> _____ <small>(FAX NUMBER)</small> <small>(EMAIL ADDRESS)</small>	

Analyses required Phosphorus

**BILLING ADDRESS** SAME AS REPORT TO   
 NAME: \_\_\_\_\_  
 COMPANY: \_\_\_\_\_  
 ADDRESS: \_\_\_\_\_  
 CITY/TOWN: \_\_\_\_\_ / PROV.: \_\_\_\_\_  
 POSTAL CODE: \_\_\_\_\_

**PAYMENT PARTICULARS (CASH NOT ACCEPTED)**

- INVOICE NEEDED / CLIENT'S P.O. NO. \_\_\_\_\_
- INTERAC
- CHEQUE Subtotal \$ \_\_\_\_\_
- VISA G.S.T. \$ \_\_\_\_\_
- MASTERCARD Total \$ \_\_\_\_\_

\* OUR POLICY IS NOT TO ACCEPT SAMPLES FROM THE PRIVATE CITIZEN WITHOUT PREPAYMENT

**SAMPLING INSTRUCTIONS ON REVERSE SIDE**  
**ALS ENVIRONMENTAL**  
 12 - 1329 Niakwa Rd. E., Winnipeg, MB Canada R2J 3T4  
 Phone: +1 204 255 9720 Fax: +1 204 255 9721 www.alsglobal.com  
 A Campbell Brothers Limited Company

**SUBMITTER COPY**

**ENTERED IN LIMS BY:** \_\_\_\_\_