SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPOONENT:  City of Thompson
PROPOSAL NAME:  City of Thompson Wastewater Treatment Plant
CLASS OF DEVELOPMENT:  2
TYPE OF DEVELOPMENT:  Sewage Treatment Plants
CLIENT FILE NO.:  5696.00

OVERVIEW:

On January 27, 2014 the Department received a Proposal from Stantec on behalf of the City of Thompson pursuant to The Environment Act for the construction and operation of a new centralized wastewater treatment plant (WWTP) located on Lot C, Plan 4657 in Township 78, Range 3 WPM in the City of Thompson, Manitoba. The WWTP will consist of the following key process components: wastewater collection system/lift station upgrades, headworks and truckhaul receiving station, secondary biological process, effluent equalization chamber, ultraviolet (UV) disinfection, sludge processing and disposal, chemical feed system, and odour control. Treated effluent will be discharged via a new 750 mm outfall to the Burntwood River. The existing wastewater treatment plant and lagoon will be decommissioned following successful start-up and commissioning of the proposed centralized WWTP.

On February 26, 2014, Manitoba Conservation and Water Stewardship placed copies of the Proposal in the Public Registries located at Legislative Library, 200 Vaughan St., Winnipeg; Millennium Public Library, 4th Floor, 251 Donald St., Winnipeg; and Online Registry, http://www.gov.mb.ca/conservation/eal/registries/index.html. Copies of the Proposal were also provided to the Technical Advisory Committee (TAC) members. The Department placed public notification of the Proposal in the Thompson Citizen on Wednesday, February 26, 2014 and Thompson Nickel Belt on February 28, 2014. The newspaper and TAC notifications invited responses until March 28, 2014.

On April 14, 2014 Manitoba Conservation and Water Stewardship forwarded requests for additional information from the TAC to the proponent’s consultant. On April 25, 2014 the consultant submitted responses to the comments and requests from the TAC. On May 2, 2014 consultant’s responses were distributed to the participating TAC for review and comment.

All additional information necessary for the review was placed in the Public Registries.

COMMENTS FROM THE PUBLIC:

No comments were received from the public.
COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE (TAC):

Manitoba Infrastructure and Transportation – Highway Planning and Design Branch, Environmental Services Section (March 6, 2014)

- No concerns

Manitoba Conservation and Water Stewardship - Lands Branch and the Protected Areas Initiative (March 26, 2014)

- The Lands Branch and the Protected Areas Initiative have no concerns with the EA proposal but notes that if the proposed project will impact Crown land, the proponent shall, prior to development on Crown land, apply for and obtain the appropriate land tenure allocations in accordance with The Crown Lands Act, from the Crown Land and Property Agency.

Disposition:

- No actions needed. The proposed wastewater treatment plant will be located on a site adjacent to the existing WWTP and the land is currently owned by the City of Thompson.

Manitoba Conservation and Water Stewardship, Regulatory Services Branch, Water Use Licensing Section (February 26, 2014)

- No concerns

Manitoba Conservation and Water Stewardship – Parks and Protected Spaces Branch (March 3, 2014)

- The Branch has no comments or concerns to offer as it does not affect any Provincial Parks, Park Reserves, Ecological Reserves, Areas of Special Interest, or proposed protected areas.

Manitoba Conservation and Water Stewardship - Air Quality–Environmental Programs & Strategies Branch (March 13, 2014)

- As mentioned in the proposal, it is expected that an approved dust suppressant will be used to mitigate the impact of dust emissions during construction works. Moreover, the effects on air quality due to vehicle emissions during construction will also be mitigated as described in the proposal.

- It is also expected that proposed biofiltration system will be implemented to control the potential odorous emissions during the plant operation.

- Air Quality Section suggests that the EA Clause regarding odour nuisance be included in the licence.
Disposition:

- The draft licence contains a clause regarding odour nuisance.

**Manitoba Labour and Immigration – Office of Fire Commissioner (March 7, 2014)**

*The Office of the Fire Commissioner recommends that the proponent obtain a Building Permit in the City of Thompson as the Code authority and an occupancy permit upon project completion. A copy of a Fire Safety plan in conformance with 2.8 of the Fire Code to be submitted to the Thompson Fire Department.*

**Proponent Response (April 25, 2014)**

- The comments are duly noted. When the project is tendered, the General Contractor is typically required by the specification to obtain a building permit based on the engineered drawings and finally an occupancy permit at completion. Also, the proposed buildings in the WWTP will be designed in accordance to the National Building Code/Manitoba Building Code which will address the required Fire Safety requirements. This will be done during the detailed design phase of the project.

Disposition:

- After receiving the additional information from the proponent, no further comments were received from Office of Fire Commissioner.

**Manitoba Conservation and Water Stewardship – Office of Drinking Water (March 25, 2014)**

*I reviewed the above noted EAP for concerns respecting drinking water safety. The only issue I would note is that I assume the new wastewater treatment plant will be serviced with domestic water from the City of Thompson water distribution system. The Manitoba Plumbing Code specifies how domestic water systems must be protected against backflow/backsiphonage and I assume this will be stipulated in the project specifications.*

**Proponent Response (April 25, 2014)**

- We confirm that connections to existing domestic water distribution will be protected by implementing backflow prevention/backflow siphoning. This feature will be included in the design drawings and appropriate products identified in the project specifications.

Disposition:

- After receiving the additional information from the proponent, no further comments were received from Office of Drinking Water.
Manitoba Conservation and Water Stewardship – Environmental Compliance and Enforcement Branch (March 19, 2014)

- The proposal calls for the use of Sequence Batch Reactor technology for the treatment of municipal wastewater in Thompson. It has been the experience of this office that the success of current systems using SBR technology in the Northeast region has been limited. The region recommends that the proponent be required to enter into a servicing agreement with a qualified contractor for a period of time to ensure proper operation, maintenance and performance of the system.

Proponent Response (April 25, 2014)

- There are a number of successful SBR systems in operations in the North. This includes the City of Flin Flon and the Town of Gillam. A few others have been installed in First Nations Communities of Garden Hill, Red Sucker Lake and St. Theresa Point. In the south there is RM of Gimli, RM of Headingley, RM of East St. Paul, RM of St. Clements (Lockport) and the City of Portage.

- SBR is a well-established treatment technology with very good track record in Manitoba. However, like any other wastewater process, it does require qualified and trained staff to monitor and maintain the system components. For a project like Thompson, it has been our experience to have the installation contractor in conjunction with the equipment supplier to operate and demonstrate the plant performance before it is accepted from a contractual perspective. These periods are not on a long-term basis but only for a short-term (typically 2 to 3 months) of operation. However, the City does have the option to extend the operating period or retain a professional agency to take over the plant operations. While this kind of arrangements is common in Alberta and BC, we haven’t seen much in Manitoba. Regardless, the comments/concerns are noted and will be discussed during the detailed design.

Disposition:
- After receiving the additional information from the proponent, no further comments were received from Environmental Compliance and Enforcement Branch.

COMMENTS FROM FEDERAL REPRESENTATION:

- The application of the Canadian Environmental Assessment Act (the Act) will not be required for this project.

PUBLIC HEARING:

- A public hearing is not recommended because no comments were received from the public.
CROWN-ABORIGINAL CONSULTATION:

The Government of Manitoba recognizes it has a duty to consult in a meaningful way with First Nations, Métis communities and other Aboriginal communities when any proposed provincial law, regulation, decision or action may infringe upon or adversely affect the exercise of a treaty or Aboriginal right of that First Nation, Métis community or other Aboriginal community.

There is no aboriginal community nearby the wastewater treatment plant and would be no infringement of aboriginal or treaty rights under Section 35 of the Constitution Act, 1982. Therefore, it is concluded that Crown-Aboriginal consultation is not required for the project.

RECOMMENDATION:

The Proponent should be issued a Licence for the construction and operation of a new centralized wastewater treatment plant in accordance with the specifications, limits, terms and conditions of the attached draft Licence. An inspection should be completed by an Environmental Engineer/Environment Officer from the Environmental Approvals Branch prior to transferring the Licence to the Region for enforcement.

A draft Environment Act Licence is attached for the Director’s consideration

PREPARED BY:

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