

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPONENT: Wild Oaks Campground (Raymond and Gisele Turenne)
PROPOSAL NAME: Wild Oaks Campground Onsite Wastewater Treatment System
CLASS OF DEVELOPMENT: One
TYPE OF DEVELOPMENT: Waste Treatment and Disposal – Holding Tank > 10,000 l/day
CLIENT NO.: 5904.00

OVERVIEW

The Proposal was received on June 1, 2017. It was dated May 31, 2017. The advertisement of the Proposal was as follows:

“A proposal was filed on behalf of Wild Oaks Campground at Richer for the construction (three phases) and operation of an onsite wastewater management system that will serve the Wild Oaks Campground which operates on a seasonal basis at NE 20-08-08 EPM in the Rural Municipality of Ste. Anne. Wastewater effluent will be disposed of on site with an Enviro-Septic wastewater treatment and disposal system consisting of several rows of corrugated and perforated plastic piping, surrounded with layers of polypropylene fiber and non-woven geotextile. Existing holding tanks will continue to be utilized with truck hauling of wastewater to licenced or permitted disposal facilities. Existing peat filtration beds will be decommissioned upon successful commissioning of the new system.”

The Proposal was advertised in the Steinbach Carillon on Thursday, August 3, 2017. It was placed in the following public registries:

- Millennium Public Library (Winnipeg)
- Legislative Library (Winnipeg)
- Online: <https://www.gov.mb.ca/sd/eal/registries/5904wildoaks/index.html>

The Proposal was distributed to Technical Advisory Committee (TAC) members on July 31, 2017.

The closing date for comments from members of the public and TAC members was September 5, 2017.

COMMENTS FROM THE PUBLIC

No public comments were received.

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 Wild Oak Campground Onsite Wastewater Management System - Technical Advisory Committee Comments

No	Technical Advisory Committee Member	Response Provided
1	Manitoba Sustainable Development –	
	Environmental Approvals – Water Power Act Licensing	No response
	Environmental Approvals - Onsite Wastewater Management Program	October 10, 2017
	Environmental Compliance and Enforcement Branch	August 30, 2017
	Climate Change and Air Quality Branch	No response
	Wildlife and Fisheries Branch	No response
	Parks and Protected Spaces Branch	No comments/concerns
	Forestry and Peatlands Branch	No response
	Indigenous Relations Branch	No response
	Lands Branch	September 5, 2017
	Water Science and Watershed Management Branch:	
	Water Quality Management Section	No response
	Groundwater Management Section	No response
	Office of Drinking Water	September 1, 2017
	Water Use Licensing Section	No response
	Water Control Works and Drainage Licensing Section	No response
	Eastern Region Integrated Resource Management Team	No response
2	Manitoba Sport, Culture, and Heritage – Historic Resources Branch	No concerns
3	Manitoba Growth, Enterprise and Trade –	
	Office of the Fire Commissioner	No concerns
4	Manitoba Infrastructure – Highway Planning and Design Branch	No concerns
5	Manitoba Municipal Relations – Community and Regional Planning Branch	No concerns
6	Manitoba Health, Seniors and Active Living – Environmental Health Unit	No response

Manitoba Sustainable Development – Environmental Approvals Branch, Onsite Wastewater Management Program

Section 2.5.4 (Wastewater Production)

The peak daily sewage flow has been calculated using holding tank pump out records. This is not a standard method as peak daily sewage flows are calculated using either (1) flow monitoring data (sewage or water) or (2) using tables in the OWMS regulation (Supplementary Information Manual), USEPA 2002 Onsite Wastewater Treatment Systems Manual, or other acceptable standards. It is unclear how accurate the holding tank pump out records are. Further, I am unclear on other calculations provided in the report. For example, the engineers have used an “estimated” peak flow of 100 L/campsite/day as opposed to the 470 L/day recommended in the USEPA Manual and the OWMS regulation (Supplementary Information). As well, they have used 3 people/campsite to determine the peak flow when there can be up to 6 people/campsite. I believe the peak daily sewage flow of 17,470 L/day may have been underestimated and should be reviewed carefully. This may be why the peat biofiltration system has failed. Another example of improper flow calculation is for the 4 bedroom residence which, as per the OWMS regulation (supplementary information), has an estimated daily sewage flow of 2,000 L/day, not 1,200 as indicated in 2.5.4.3.

Section 2.5.5.1 and 2.5.5.2

There is insufficient soil information to support the design of this system. Soil test pits or auger boreholes need to be used to determine the soil texture classification and the depth to restrictive soil layers (bedrock, clay, cemented soils) and groundwater table. The use of well drillers logs and topographical surveys is unacceptable as this method is highly inaccurate. The soil test pits or boreholes need to be excavated to a depth that demonstrates there is at least 1.0 metre of unsaturated permeable soil below the disposal field system. Lastly, soil samples need to be sent to a lab for particle size analysis to obtain the soil texture classification.

The proponent should be required to conduct and document a proper assessment of the soil and groundwater conditions. Soil samples need to be submitted to a lab for soil texture classification as this is used to determine the soil application rate used to size the Enviro-Septic system.

Note: the schematic drawings provided by DBO in Appendix C indicate the Soil Type is to be determined.

Other Observations

There is other important information missing in the report:

- The report indicates the septic and holding tank volumes range from 1,800 L to 6,300 L but there are no calculations or information provided to know if these are adequately sized for the new system. At the very least, these tank sizes need to meet the minimum requirements in the OWMS regulation.
- There is no information provided on how the Enviro-Septic disposal field system was sized (i.e., the soil application rate, sizing calculations).

Disposition:

These comments were provided to the applicant's consultant for response.

Manitoba Sustainable Development – Environmental Compliance and Enforcement Branch

The Environmental Compliance and Enforcement Branch (ECE) submits the following comments for the above Environment Act proposal:

1. Section 2.5.7 of the proposal indicates that the existing forcemain and service piping will continue to be utilized. ECE requests the proponent to confirm if an assessment of this infrastructure was conducted as part of the site investigation, and if so, if any upgrades/repairs are required.
2. Section 2.5.4.5 of the proposal discusses wastewater production from the existing laundromat. ECE requests information on the proposed management of the wastewater from this source.
3. Section 1.3 of the proposal references the existence of a greywater pit but does not identify the greywater source. ECE requests clarification regarding the source and the proposed management of the greywater.

Disposition:

These comments were provided to the applicant's consultant for response.

Manitoba Sustainable Development – Lands Branch

Please note the comment below from Forestry and Peat Land Management SD:

- Ensure no impacts to adjacent stand of timber within SE 29-08-08 that is coded as 7a/D.

Disposition:

This comment was provided to the applicant's consultant for response.

Manitoba Sustainable Development – Office of Drinking Water

The ODW has no concerns with the above-noted EAP with regard to drinking water safety.

However, the licence should reflect that the proposed expansion of the Wild Oaks Campground would require a permit under the Drinking Water Safety Act and must include engineered drawings. Failure to have a permit for the expansion could result in

enforcement action being taken as drinking water safety could be compromised if sufficient water treatment and storage requirements are not met.

Disposition:

This comment was provided to the applicant's consultant for response.

ADDITIONAL INFORMATION

Responses to Technical Advisory Committee comments were requested on November 17, 2017. Additional information addressing the comments was provided on December 14, 2017. This information was circulated to concerned Technical Advisory Committee members on December 14, 2017. Comments on the additional information were received from the Onsite Wastewater Management Program and the Environmental Compliance and Enforcement Branch. The additional information and Technical Advisory Committee responses are provided in the public registries.

The applicant's consultant filed a Notice of Alteration on December 7, 2018. The alteration involved the installation of additional holding tanks to replace the existing peat filtration system. Therefore, all wastewater from the Development would be collected in holding tanks, and no wastewater would be treated with an onsite wastewater disposal system. The Notice of Alteration is posted in the public registries.

Additional information concerning the Notice of Alteration was requested on May 29, 2019. A response was provided by the applicant's consultant on June 4, 2019. Both the request and response are posted in the public registries.

All outstanding issues have been addressed by the information available.

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 campground on private land already owned by the applicant, with water supplied by a well and wastewater collected in holding tanks and hauled to a municipal wastewater treatment facility. Since resource use

is not affected by the project, it is concluded that Crown-Indigenous consultation is not required for the project.

RECOMMENDATION

As there are no outstanding concerns, 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 Eastern Region of the Environmental Compliance and Enforcement Branch.

PREPARED BY:

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