

## Sagan, Barsha (SD)

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**From:** Sagan, Barsha (SD)  
**Sent:** December-29-17 2:46 PM  
**To:** Oswald Wohlgemut  
**Cc:** gtureenne@mymts.net; 'Jerry Cousin'  
**Subject:** RE: Wild Oak Campground EAP TAC comment round 2  
**Attachments:** Wild Oak Campground EAP - TAC comment response round 2 (file# 5904.00).pdf

Please find the attached TAC comments of the Wild Oak Campground EAP in response to the letter sent on December 14, 2017 via email.

Thank you.

*Barsha Sagan, M.A.Sc.; P.Eng. | Environmental Engineer | Municipal and Industrial Section | Environment Approvals Branch | Manitoba Sustainable Development | Regular Mail - 160-123 Main Street (BOX 80), Winnipeg MB R3C 1A5 | Couriers - 2<sup>nd</sup> Floor 123 Main Street, Winnipeg MB R3C 1A5 | Phone: 204.945.5234 | Email: [barsha.sagan@gov.mb.ca](mailto:barsha.sagan@gov.mb.ca)*

**From:** Oswald Wohlgemut [<mailto:owohlgemut@jrcc.ca>]  
**Sent:** December-14-17 11:40 AM  
**To:** Sagan, Barsha (SD) <[Barsha.Sagan@gov.mb.ca](mailto:Barsha.Sagan@gov.mb.ca)>  
**Cc:** gtureenne@mymts.net; 'Jerry Cousin' <[jcousin@jrcc.ca](mailto:jcousin@jrcc.ca)>  
**Subject:** RE: Wild Oak Campground EAP TAC comment summary

Hello Barsha,

We have attached responses to comments from the TAC review of the Wild Oak Campground EAP. Please review and let us know if you have any additional comments. In addition, would you be able to send us a copy of the draft licence for review when it is ready.

Regards,

Oswald Wohlgemut, M.Sc.  
Environmental Scientist

J.R. Cousin Consultants Ltd.  
Phone: (204) 489-0474  
Fax: (204) 489-0487  
[www.jrcc.ca](http://www.jrcc.ca)

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**From:** Sagan, Barsha (SD) [<mailto:Barsha.Sagan@gov.mb.ca>]  
**Sent:** Friday, November 17, 2017 11:10 AM  
**To:** 'gtureenne@mymts.net'; 'jcousin@jrcc.ca'

**Cc:** Oswald Wohlgemut

**Subject:** RE: Wild Oak Campground EAP TAC comment summary

Please review and address the concerns of the TAC members.

Thank you.

**Barsha Sagan, M.A.Sc.; P.Eng.** | *Environmental Engineer | Municipal and Industrial Section | Environment Approvals Branch | Manitoba Sustainable Development | Regular Mail - 160-123 Main Street (BOX 80), Winnipeg MB R3C 1A5 | Couriers - 2<sup>nd</sup> Floor 123 Main Street, Winnipeg MB R3C 1A5 | Phone: 204.945.5234 | Email: [barsha.sagan@gov.mb.ca](mailto:barsha.sagan@gov.mb.ca)*

## Sagan, Barsha (SD)

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**From:** Smith, Derek (SD)  
**Sent:** December-22-17 3:04 PM  
**To:** Sagan, Barsha (SD)  
**Cc:** Burland Ross, Siobhan (SD)  
**Subject:** RE: Wild Oak Campground EAP - TAC comment response from the consultant (file# 5904.00)

Hi Barsha. Upon review of J.R. Cousin Consulting's response letter, I still have a number of concerns about this proposal and suggest we meet with the client and their consultant. My main concerns are:

- (1) The required site and soil evaluation information has not been submitted and therefore the potential impacts to the environment and public health cannot be accurately assessed for this project.
- (2) The proposed daily design wastewater flow (hydraulic loading) of 17,470 litres/day is substantially less than what is required in the Onsite Wastewater Management Systems Regulation MR 83/2003 (i.e., Supplementary Information Manual) and other recognized industry standards. For example, as specified in the MB Supplementary Information Manual (2011), the daily wastewater flow for a campsite is 110 litres/person/day. Based on 157 campsites and assuming an average occupancy of 3 people/campsite, the daily wastewater flow would be 51,810 litres/day. If we include the residence (assume 3 bedrooms = 1,500 litres/day) and laundromat (570 litres/day), the total daily wastewater flow is 53,880 litres/day. If we base the flow calculations on RV's, which have a daily wastewater flow of 470 litres/day/campsite, the daily wastewater flow for the campsites is  $157 \times 470 \text{ L/d} = 73,790 \text{ litres/day}$ , which does not include the residence or laundromat.

While I agree that the daily wastewater flow values used in the MB Supplementary Information Manual and other recognized industry standards can be overly conservative, there is insufficient justification provided to support a design daily wastewater flow of 17,470 litres/day, which is at least 3 – 4 times lower than the flows calculated above. As indicated in the report, the daily wastewater flow was calculated using limited sewage pump out records, an assumed daily wastewater flow of 100 litres/day/campsite and an average occupancy of 3 people/campsite. In Section 2.5.4, JRCC acknowledges that "accurate records of volumes of effluent currently being produced are not available". Therefore, the sewage hauling record data used is questionable and does not provide any safety factor. Also, the report indicates that each campground can accommodate up to 6 people/campsite so it does not make sense to use 3 people/campsite when considering peak flows.

There are two inconsistencies concerning the information about daily wastewater flows in the report: (1) Section 2.5.4 (2 – 4) states that the system will be sized to accommodate wastewater flow from the existing holding tanks. However, Section 2.5.9 (2-10) states the existing holding tanks servicing the 46 seasonal sites will continue to be pumped out, and (2) Section 2.5.7.1 (2 – 9) states the onsite system will be installed in three phases. However, the total daily wastewater flow for all 3 phases is given as 11,100 litres/day, not 17,470 litres/day as indicated in Section 2.5.4.7.

- (3) Additional information needs to be provided concerning the septic tank and pump tank volumes. These tanks need to be sized in accordance with the minimum requirements in MR 83/2003 to ensure the disposal field is not overloaded with wastewater constituents such as BOD, TSS and nutrients. It is understood that there are existing septic/pump tanks at the campground but this does not mean that they are adequately designed or sized for this proposed system.

Also, I would like to obtain some information from ECE concerning the existing onsite wastewater system including (1) was a permit issued? and (2) why did the existing peat filtration system fail?

Please contact me if you have any questions.

**Derek Smith, B.Sc., Tech. Dipl., C.P.H.I.**  
Onsite Wastewater Management Specialist  
Environmental Approvals Branch  
Manitoba Sustainable Development  
1007 Century Street  
Winnipeg, MB R3H 0W4  
Ph: (204) 794 - 1176 Fax: (204) 948 - 2338  
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To report an Environmental Emergency please call our **24/7 Emergency Response Line (204)944-4888**  
**Toll Free in Manitoba 1-855-944-4888**

**From:** Sagan, Barsha (SD)  
**Sent:** December-14-17 2:31 PM  
**To:** +WPG1212 - Conservation\_Circulars (SD) <ConCirculars@gov.mb.ca>; Oertel, Diane (SD) <Diane.Oertel@gov.mb.ca>; Smith, Derek (SD) <Derek.Smith@gov.mb.ca>  
**Subject:** Wild Oak Campground EAP - TAC comment response from the consultant

Please review the consultant's response to the TAC comments and let me know if you still have any concerns.  
Thank you.  
Barsha

**From:** Oswald Wohlgemut [<mailto:owohlgemut@jrcc.ca>]  
**Sent:** December-14-17 11:40 AM  
**To:** Sagan, Barsha (SD) <[Barsha.Sagan@gov.mb.ca](mailto:Barsha.Sagan@gov.mb.ca)>  
**Cc:** [gturenne@mymts.net](mailto:gturenne@mymts.net); 'Jerry Cousin' <[jcousin@jrcc.ca](mailto:jcousin@jrcc.ca)>  
**Subject:** RE: Wild Oak Campground EAP TAC comment summary

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Regards,

Oswald Wohlgemut, M.Sc.  
Environmental Scientist

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DATE: December 28, 2017

TO: Barsha Sagan  
Environmental Approvals  
Sustainable Development  
123 Main Street, Suite 160  
Winnipeg MB R3C 1A5

FROM: Eastern Region  
Environmental Compliance and Enforcement  
Sustainable Development  
Box 4000  
Lac du Bonnet MB R0E 1A0

**SUBJECT: Wild Oaks Campground Wastewater Treatment and Disposal System  
Environment Act Proposal (Client File 5904.00) - Proponent's Response -  
Environmental Compliance and Enforcement Comments**

Environmental Compliance and Enforcement Branch (ECE) submits the following comments in response to the proponent's reply to comments initially submitted by ECE on August 30, 2017:

**Response Item 3.1.:**

ECE is satisfied with the proponent's response and has no further comments.

**Response Items 3.2. and 3.3.:**

The proponent confirms that wastewater from the laundromat and shower facilities discharges to an existing greywater pit. Further, the proponent indicates that wastewater generated by these facilities will continue to be directed to the greywater pit after development and commissioning of the new wastewater treatment system.

The Onsite Wastewater Management Systems Regulation (M.R. 83/2003) requires that where a building is served by a water system under pressure, no person shall discharge greywater from the building except into a disposal field, holding tank, or other approved system. ECE recommends that the greywater pit be decommissioned, and the wastewater from the laundromat and shower facilities be discharged to a wastewater management system that is consistent with the requirements and intent of M.R. 83/2003.

