

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPONENT: Manitoba Conservation - Parks and Natural Areas Branch
NAME OF DEVELOPMENT: White Lake Campground – Onsite Wastewater Treatment System and Disposal Field
CLASS OF DEVELOPMENT: Two
TYPE OF DEVELOPMENT: Waste Treatment – Sewage Treatment Plant
CLIENT FILE NO.: 5467.00

OVERVIEW:

The Proposal was received on June 1, 2010. It was dated May 31, 2010. The advertisement of the proposal was as follows:

“A Proposal has been filed by J. R. Cousin Consultants Ltd. on behalf of Manitoba Conservation – Parks and Natural Areas Branch for the construction and operation of a wastewater treatment and disposal system to service the White Lake Campground and adjacent facilities in Whiteshell Provincial Park. The system is proposed to consist of an existing septic tank and lift station, and new settling tanks, moving bed biological reactor units, a dosing tank, peat biofilters and a mounded disposal field. The components would work sequentially to treat and dispose of wastewater from the campground and an existing adjacent resort during the period from May to September each year. During the remainder of the year, wastewater would be trucked from the septic tank and lift station to a licensed wastewater treatment lagoon at another location. New components of the treatment system would be located over and adjacent to an existing septic field that is no longer in use and would be decommissioned. Construction of the project is proposed for the summer/fall of 2010, with operation commencing in May, 2011.”

The Proposal was advertised in the Winnipeg Free Press on Saturday, June 19, 2010. It was placed in the Main, Millennium Public Library (Winnipeg), Eco-Network, and Brokenhead Regional Library public registries. The Proposal was distributed to TAC members on June 17, 2010. The closing date for comments from members of the public and TAC members was July 20, 2010.

COMMENTS FROM THE PUBLIC:

No public comments were received.

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:

Manitoba Conservation – Sustainable Resource and Policy Management No concerns.

Manitoba Conservation – Environmental Operations, Eastern Region

- The Proposal indicates two different field sizes of 634 m² (page 2-12) and 840 m² (page 4 of Appendix C). Environmental Operations requests that the proponent provides clarification of the field size being proposed, along with the calculations from which the field size is derived.
- Page 4-2 (Addendum for Management Practice) indicates that the fecal coliform content of the effluent will not exceed 500 per 100 ml of sample, rather than 200 per 100 ml of sample. It is assumed that this is an error which requires correction.
- The report indicates that sand will be hauled from a local borrow area to be used as a base. It is uncertain if the sand will also be used to filter the wastewater. If so, then the proponent should specify if this sand meets ASTM C33 requirements. The report does not indicate if any testing (sieve size) will be carried out to confirm that the sand contains less than 5% fines (0.075mm particle size) as required in general standard of practice if the material is being used for filtration of wastewater.

Disposition:

Additional information was requested to address the first and third comments. The fecal coliform content had previously been confirmed by the consultant for the project. As the treatment system is not designed to discharge effluent, the fecal coliform content of the effluent is not a design consideration, and does not need to be addressed through licence conditions.

Manitoba Conservation – Parks and Natural Areas No comments.

Manitoba Conservation – Wildlife and Ecosystem Protection No concerns.

Manitoba Conservation – Air Quality Management No concern.

However, it is suggested that the more comprehensive “odour nuisance” clause be included in the EA Licence. Although odour generation will likely be minimal, the treatment components are near cottages (ex. disposal field is 20 metres from a cottage.)

Disposition:

This comment can be addressed through a licence condition. Although the 20 metre separation distance to the nearest cabin is mentioned in the Proposal, a review of the site’s location plan indicates that the separation distance is approximately 60 metres, and that the closest cabin is a rental cabin that is expected to be serviced by the

Development in the future.

Manitoba Water Stewardship

- Manitoba Water Stewardship recommends an *Environment Act* Licence to include the following requirements:
 - The fecal coliform content of the effluent will achieve 200 fecal coliforms per 100 millilitres of sample to comply with the Manitoba Water Quality Standards, Objectives, and Guidelines.
 - Note: on page 4 -2 of the proposal, the fecal coliform content of the effluent is proposed to be 500 fecal coliforms per 100 millilitres of sample; this does not comply with the Manitoba Water Quality Standards, Objectives, and Guidelines.
- Manitoba Water Stewardship requests clarification for the following concerns:
 - The proposal mentions that the resort has rental cabins which are currently connected to a separate collection and holding tank system (page 2 -3). However the proposal also states that it is expected that the cabins will contribute to the proposed treatment system in the future. In the future, would the rental cabin holding tanks be decommissioned or incorporated as apart of the proposed wastewater system?
 - Due to the variable flow and the peak flow occurring in the summer months, what safety measures are in place to ensure the wastewater system does not overload?
 - If the system does overload, what contingency plans does the proponent have in place to address this problem?
 - The proposal states that during the winter season, the mound disposal system will not be accepting waste. Would this accumulation of waste during the winter season be trucked to Brereton Lake Lagoon?
- Manitoba Water Stewardship submits the following comments:
 - The Manitoba Department of Water Stewardship is mandated to ensure the sustainable development of Manitoba's water resources. Manitoba Water Stewardship is committed to the goals of: protecting aquatic ecosystem health; ensuring drinking water is safe and clean for human health; managing water-related risks for human security; and stewarding the societal and economic values of our waterways, lakes and wetlands; for the best water for all life and lasting prosperity. Manitoba Water Stewardship achieves these goals, in part, through administering

legislation, including *The Water Protection Act*, *The Water Rights Act*, and *The Water Power Act*.

- *The Water Rights Act* requires a person to obtain a valid licence to control water or construct, establish or maintain any “water control works.” “Water control works” are defined as any dyke, dam, surface or subsurface drain, drainage, improved natural waterway, canal, tunnel, bridge, culvert borehole or contrivance for carrying or conducting water, that temporarily or permanently alters or may alter the flow or level of water, including but not limited to water in a water body, by any means, including drainage, OR changes or may change the location or direction of flow of water, including but not limited to water in a water body, by any means, including drainage. If a proposal advocates any of the aforementioned activities, a person is required to submit an application for a Water Rights Licence to Construct Water Control Works. A person may contact the following Water Resource Officer to obtain an application and/or obtain information.
 - A contact person is Mr. Geoff Reimer C.E.T., Senior Water Resource Officer, Water Control Works and Drainage Licensing, Manitoba Water Stewardship, Box 4558, Stonewall, Manitoba R0C 2Z0, telephone: (204) 467-4450, email: geoff.reimer@gov.mb.ca.
- The proponent needs to be informed that if the proposal in question advocates any construction activities, erosion and sediment control measures should be implemented until all of the sites have stabilized.

Disposition:

As discussed above, the proposed Development will not discharge effluent to the environment, and so is not required to meet surface water discharge standards. With respect to the items where clarification is requested, decommissioning of unused facilities in the future can be addressed as a licence condition, as well as the disposal of wastewater during the winter period. With respect to overloading and contingency plans, if the system cannot accommodate peak loading, pumping would occur from the campground septic tank and lift station and the treatment facility settling tanks. The removed wastewater would be truck hauled to a facility with available treatment capacity. This would be addressed through licence conditions.

Manitoba Innovation, Energy and Mines, Mines Branch No concerns.

Manitoba Infrastructure and Transportation, Highway Planning and Design Branch No concerns.

Canadian Environmental Assessment Agency

The project information that was provided by Manitoba Conservation has been reviewed by the Canadian Environmental Assessment Agency (CEAA) and was shared with the following federal departments: the Department of Fisheries and Oceans, the Department of Indian and Northern Affairs, Health Canada and Environment Canada. I am enclosing copies of the relevant responses for your file. Based on the responses to the survey the application of the Canadian Environmental Assessment Act (the Act) by a federal authority may be required for this project.

The Department of Fisheries and Oceans (DFO) has not determined its interest in this project. When I receive a formal response from DFO I will inform you in writing.

Health Canada (HC) has provided a letter stating areas of expertise it has in areas related to human health. HC can provide its expertise for your review if a written request for specific information is submitted. Please see the attached copy of the letter from HC.

Disposition:

DFO comments will be reviewed when provided.

ADDITIONAL INFORMATION:

Additional information was requested on July 29, 2010 to address TAC comments. The attached response was received on August 4, 2010. The response satisfactorily provides the requested information. In discussing decommissioning of holding tanks made redundant by the Development, the consultant indicated that rental cottage holding tanks would not be connected to the Development for the foreseeable future. Temporary above ground holding tanks being used until the Development is constructed would be emptied to a licensed wastewater treatment facility and disconnected from the wastewater collection system. As a result, no further direction on decommissioning for holding tanks will be provided in the licence.

PUBLIC HEARING:

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

RECOMMENDATION:

All comments received on the Proposal that require follow-up have been addressed through additional information or as licence conditions. Therefore, 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. It is further recommended that enforcement of the Licence be retained by the

Environmental Assessment and Licensing Branch until construction is completed. Enforcement can then be transferred to the Eastern Region of Environmental Operations.

Environment Act Licence No. 1413, which regulates the existing wastewater treatment facility at this location, should be rescinded upon the commissioning of the new facility.

PREPARED BY:

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