

File No.: 1071.10, 53.1, 1069.10

December 19, 2024

Tim Shanks
Director
Water and Waste, City of Winnipeg
110-1199 Pacific Avenue
Winnipeg MB R3E 3S8
tshanks@winnipeg.ca

Dear Tim Shanks:

Re: Environment Act Licence Nos. 2684 RRR (NEWPCC); 2716 RR (SEWPCC); and 2669 E RR (WEWPCC); Annual Reporting - River Crossing Monitoring Plan Report Response

Thank you for the annual river crossing monitoring and condition assessment report, dated January 25, 2024 for the 2023 calendar year as required by Environment Act Licence Nos. 2684 RRR; 2716 RR; and 2669 E RR.

The recent discharge of a large amount of untreated wastewater to the Red River at the Fort Garry Bridge (Abinojii Mikanah) calls for establishing a more rigorous monitoring plan with rehabilitation activities for the pipes that transport wastewater via river crossings in the City of Winnipeg.

You stated that in 2024, the City is developing a more robust risk-based framework for managing river crossing assets including identifying crossings of higher risk and reviewing potential emergency response plans to prioritize future inspections and rehabilitation /renewal works. Please file a notice of alteration for an updated leak detection program as per the following:

- Clause 19 of Licence 2684 RRR, as amended October 22, 2018
- Clause 19 of Licence 2716 RR
- Clause 20 of Licence 2669 E RR

Many crossings had inspections, testing, and upgrades such as regrading and armoring to be completed in 2024/2025. Please provide an update on the following:

- The status of the 2024 report discussing results of inspections and testing.
- Whether or not the regrading and armoring work to be completed in 2025 is on track.

The department is unclear on how the risk assessment is conducted to determine when to inspect/test crossings and when to move forward with repairs or replacement. Specifically:

- How are structural performance gradings determined?
- Are pipes of different materials (e.g., HDPE vs. steel) handled differently in terms of inspection frequency?
- Why are the inspection frequencies presented in the annual report different from the 2017 Technical Memorandum? (i.e., the technical memorandum states crossings with an SPG of 2 should be inspected every 5 years, yet the Archibald crossing, with a grade of 2, will be inspected in 20 years).
- What is the basis for the inspection frequencies for each SPG?
- Why is the base inspection frequency for new pipe installations 30 years?
- Is there any pipe deformation that is occurring that has not been identified in the table?

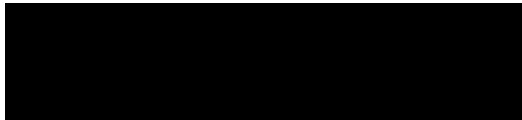
The department identified the following items to be included in future reports to provide further clarification:

- Provide an SPG for all river crossings.
- Include a map of the locations of each river crossing.
- In the main table, include which treatment facility each river crossing is connected to.
- If a crossing has been recently rehabilitated or replaced, please remove old information in the "Inspection and Rehabilitation" column.
- The report should reference the licence requirement(s) that give rise to the report.
- Identify the installation year for all river crossings.
- Add a separate column to the table that describes testing/inspection frequency and the source document used to determine that frequency.
- Ensure any proposed work is prominently shown in the table and carried over to next year's report.
- Provide more detail on your plan for inoperable isolation valves, including details on "other reliable isolation methods" and reasons why valves are not being replaced.

The City of Winnipeg may be required to submit notices of alteration for future rehabilitation, modification, or replacement of river crossings.

Should you have any questions regarding this letter, please contact Siobhan Burland Ross, Engineering Manager, Industrial and Wastewater, Environmental Approvals Branch at Siobhan.BurlandRoss@gov.mb.ca or 204-793-6487.

Sincerely,



Agnes Wittmann
Director
The Environment
Act

- c. Chris Carrol, Susan Lambert, Andrew McMillan, Cynthia Wiebe, Stacy Cournoyer, Bronwyn Jones- City of Winnipeg
Yvonne Hawryliuk, Kristy Forrestall, Sonja Bridges, Neil Rentz- Environmental Compliance and Enforcement
Siobhan Burland Ross, Barsha Sagan- Environmental Approvals