

Conservation and Water Stewardship

Environmental Stewardship Division
Environmental Approvals Branch
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File: 122.20

February 2, 2015

Wally R. Melnyk Chief Administrative Officer 178 Main Street North Box 10 Russell, MB ROJ 1W0

Dear Mr. Melnyk:

Re: Town of Russell Wastewater Treatment Lagoon - Sludge Characterization

Receipt of the December 16, 2014 Town of Russell Lagoon Characterization report prepared by WSP is acknowledged. Environment Act Licence No. 2738 R applies to the Town of Russell (Town) wastewater treatment lagoon (lagoon). The report is received as a Notice of Alteration (NoA).

The NoA is understood to have been submitted to Manitoba Conservation and Water Stewardship in support of the Town's desire to obtain authorization to excavate and dispose of sludge that has accumulated in the primary cell of the lagoon. The sludge is understood to consist of a combination of white precipitate resulting from the Town's water treatment plant and domestic sludge associated with municipal wastewater.

The NoA indicates that the estimated volume of the precipitate/sludge material (material) to be removed is less than 1,210 m³. The NoA suggests that nitrogen within the material may not be available to plants while the phosphorus would be available to plants. In addition, the NoA indicates that the organic matter content of the material remains within background levels and is anticipated to provide little benefit to soil if it were to be land applied. The NoA goes on to suggest that the high phosphorus concentration remains a concern in consideration of land application and the potential for nutrient leaching and run-off. The NoA concludes with a recommendation that the precipitate/sludge material be encapsulated in clay pits with clay covers at the waste disposal ground.

Upon review of the NoA, while we cannot agree with all of the summarized information presented in the report, due to the relatively small volume of material that is proposed to be removed, I have decided pursuant to Section 14(2) of *The Environment Act* to approve the excavation of the material from the primary cell of the lagoon and the disposition of it by

encapsulating it in clay pits with clay covers at the waste disposal ground pursuant to the following conditions:

- 1. The submission of the \$500 fee required to be submitted with a NoA of this type pursuant to *Manitoba Regulation 168/96 Environment Act Fees*.
- 2. The responsible Environment Officer shall be notified at least two working days before the commencement of excavating and transferring the material from the lagoon.
- 3. The integrity of the liner and structure of the lagoon must not be negatively impacted by the planned activities.
- 4. The sludge must be transported in containers in such a manner to prevent loss of wastewater and sludge to the satisfaction of an Environment Officer.
- 5. The excavated material must be disposed of at a waste disposal ground operating under a permit issued in accordance with *Manitoba Regulation 150/91* or under the authority of a Licence issued pursuant to *The Environment Act*; and
- 6. Once the material is encapsulated, a brief summary describing the activities shall be provided to the Director.

Attached for your reference is "Information Bulletin – Alterations to Developments with Environment Act Licences". The document provides related information regarding requirements for proposed alterations to licenced developments.

If you have any questions or would like to discuss the foregoing, please contact Robert Boswick, Environmental Engineer, at (204) 945-6030.

Yours truly,

"original signed by"

Tracey Braun, M.Sc. Director

Attachment

c. Jason Bunn, P. Eng., Environmental Engineer – WSP Canada Inc. (jason.bunn@wspgroup.com)
Don Labossiere, Director – Environmental Compliance and Enforcement, Manitoba
Conservation and Water Stewardship

Tim Prawdzik, Provincial Manager – Environmental Compliance and Enforcement, Manitoba Conservation and Water Stewardship