

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPONENT: Manitoba Conservation – Parks and Natural Areas
PROPOSAL NAME: Winnipeg Beach Provincial Park Holding Tank System
CLASS OF DEVELOPMENT: 2
TYPE OF DEVELOPMENT: Waste Treatment and Storage and Scrap Processing
CLIENT FILE NO.: 5453.00

OVERVIEW:

On March 9, 2010, the Department received an Environment Act Proposal (EAP) on behalf of Manitoba Conservation – Parks and Natural Areas Branch for the construction and operation of a wastewater collection system and a wastewater holding tank system to serve a 120-site seasonal recreational vehicle park in 34-17-4EPM in Winnipeg Beach Provincial Park in the Town of Winnipeg Beach. Wastewater will be pumped out of the holding tank system and trucked by licensed haulers to the Village of Dunnottar wastewater treatment lagoon for treatment. The Village of Dunnottar wastewater treatment lagoon operates under Environment Act Licence No. 2704.

The Department, on March 12, 2010, placed copies of the EAP report in the Public Registries located at 123 Main St. (Union Station), the Millennium Public Library, the Manitoba Eco-Network and the Town of Winnipeg Beach Office and provided copies of the EAP report to the Canadian Environmental Assessment Agency (CEAA) and Technical Advisory Committee (TAC) members. As well, the Department placed public notifications of the EAP in the Interlake Spectator on Friday, March 19, 2010 and the Winnipeg Free Press on Saturday, March 20, 2010. The newspaper and TAC notifications invited responses until April 19, 2010.

On May 7, 2010 Manitoba Conservation forwarded requests for additional information from the TAC and federal components as well as one public participant to the proponent. The proponent's May 19, 2010 response to the requests was then provided to the participating TAC and federal components as well as the one public participant for review and comment on May 21, 2010.

In a June 7, 2010 letter the public participant provided additional comments while there were no additional comments from the TAC and federal components.

COMMENTS FROM THE PUBLIC:

George Derenchuk – March 24, 2010

- *I wish to express my concern regarding seasonal recreational vehicle park campground effluent being conveyed from Winnipeg Beach to the Dunnottar lagoon. I submit the following observations:*
 1. *Is this trip necessary? Would it not make more environmental sense to convey Winnipeg Beach campground wastewater to the Gimli treatment plant? I am relatively certain that test results of treated effluent prior to discharge into Lake Winnipeg will show that effluent treated at the Gimle treatment plant will be more environmentally friendly than that of effluent treated at the Dunnottar lagoon.*
 2. *According to Environment Act Licence No. 2704, the Village of Dunnottar is allowed a single annual discharge of lagoon content. However, I can recall that village authorities arranged for an emergency discharge in July of 2007 or 2008. Tugela Creek in Whytewold was the conveyance outlet with the discharge directed into Lake Winnipeg. Are emergency discharges reflected in the Stantec report with discharge dates shown or are they not recorded?*
 3. *Should it turn out that the Gimli Sewage Treatment Plant is not operating at top efficiency, then an effort must be made to immediately correct this situation.*
 4. *Lagoon integrity at Winnipeg Beach must be brought up to standard and the vehicle park project delayed until proper environmental standards are met.*

Proponent Response – May 19, 2010

- The RV Park will be connected to the Gimli Regional system if the pipe system is extended to Winnipeg Beach;
- The Village of Dunnottar has indicated that no emergency discharges of the lagoon have taken place since the recent expansion. There were no emergency discharges in 2007 or 2008;
- The Gimli Sewage Treatment Plant is not currently designed to accommodate flows from Winnipeg Beach. The Town of Winnipeg Beach was given an opportunity to connect to the plant during the design phase but elected not to. Additional capacity may be added to the plant in the future if the Town of Winnipeg Beach wanted to connect; and
- The operation and maintenance of the Winnipeg Beach Lagoon is the responsibility of the Town of Winnipeg Beach.

George Derenchuk – June 7, 2010

- *It appears that one of the main stumbling blocks to have the RV Park connected to the Gimli Regional System is the fact that there is no pipe system extended from the Gimli Sewage Treatment Plant to Winnipeg Beach.*

Apparently, the Gimli Sewage Treatment Plant is not currently designed to accommodate flows from Winnipeg Beach. The Town of Winnipeg Beach elected not to connect to the Gimli plant during the design phase. This is probably a decision based upon cost factors.

Since the operation and maintenance of the Winnipeg Beach lagoon is the responsibility of the Town of Winnipeg Beach, then lagoon improvement is on hold?

Would it not be possible to encourage the Province of Manitoba to urge the Town of Winnipeg Beach to improve their existing lagoon system and to connect to the Gimli Sewage Plant (even though it means Gimli Sewage Plant re-tooling) through federal and provincial financial assistance incentives?

Hopefully the plan to convey the contents of the Winnipeg Beach Provincial Park Wastewater Holding Tank System to the Dunnottar lagoon(s) will prove to be a temporary solution to effluent storage and marginal treatment options in keeping with explicit approval from Manitoba Conservation. Such treatment is not as effective as would be the case whereby the Gimli Sewage Treatment Plant is put to use.

REMEMBER!

Mitigation and rehabilitation of Lake Winnipeg environmental concerns is a COLLECTIVE RESPONSIBILITY and not that of the Federal Fisheries and Oceans only!

Disposition:

- The draft Environment Act Licence contains Clauses that require that the Licencee direct all sewage generated within the Winnipeg Beach Campground toward the wastewater collection and holding tank system or other approved sewage treatment facilities.
- The draft Environment Act Licence contains a Clause that requires that the Licencee, prior to commencing use of the wastewater holding tank system, enter into a service agreement(s) with a service provider(s) for receiving and providing treatment of the sewage and wastewater from the holding tanks of this Development at an off-site wastewater treatment facility operating under the authority of a Licence issued under The Environment Act thereby allowing some flexibility as to where the wastewater is delivered for treatment.

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:

Conservation – Environmental Services

- *The holding tanks installed must be in compliance with The Onsite Wastewater Management Systems Regulation (MR 83/2003) including conformance with minimum setback distances and the requirements of Canadian Standards Association Standard B66-00, Prefabricated Septic Tanks and Sewage Holding Tanks, and must be installed by a certified installer.*
- *Recommend that a site plan indicating the location of the holding tanks complete with the dimensions to nearest property lines, surface watercourses etc. be requested.*
- *Recommend that details be provided for the volume of wastewater to be generated at the proposed 3 washroom and shower buildings and where the wastewater is to be directed.*
- *The McGowan Russell report of October 12, 2007 references a water/splash/spray park. If this is still planned to be constructed, recommend the proponent identify the volume of wastewater generated and where the wastewater is to be directed.*
- *In the event that the daily volume of wastewater generated exceeds the 55,000L/day accepted at the Village of Dunnottar, recommend the proponent identify where the wastewater will be transported.*
- *Consider noting that access to the holding tanks will need to be maintained year-round.*

Proponent Response – May 19, 2010

- The holding tanks will be manufactured and installed in accordance with the appropriate regulations;
- A site plan with the holding tank location was included with the EAP. A revised sketch with dimensions to the nearest property line and Lake Winnipeg was attached;
- Flows for the shower buildings were provided by the Mechanical Engineer for the project, Faraci Engineering, based on building fixture counts;
- The water park has been removed from the project scope;
- Wastewater volumes will be closely monitored during the first year of operation to confirm the amount of wastewater being generated. The Park wastewater collection system can be temporarily shut down if required; and
- The holding tanks are adjacent to the Park maintenance compound which will enable access year-round if required.

Disposition:

- The draft Environment Act Licence contains a Clause that sewage and wastewater pumped and hauled from the holding tank system by haulers registered, or who are employed by haulers registered, in accordance with Schedule G of *Manitoba Regulation 83/2003* respecting *Onsite Wastewater Management Systems* or any future amendment thereof.
- The draft Environment Act Licence contains a Clause that requires that the Licencee obtain and maintain classification of the Development pursuant to *Manitoba Regulation 77/2003* respecting *Water and Wastewater Facility Operators* or any future amendment thereof and maintain compliance with all requirements of the regulation including, but not limited to, the preparation and maintenance of a Table of Organization, Emergency Response Plan and Standard Operating Procedures.
- The draft Environment Act Licence contains a Clause that requires that the Licencee carry out the operation of the Development with individuals properly certified to do so pursuant to *Manitoba Regulation 77/2003* respecting *Water and Wastewater Facility Operators* or any future amendment thereof.
- The draft Environment Act Licence contains a Clause that the Licencee operate and maintain the wastewater collection and holding tank system in such a manner that the maximum daily flow rate is not in excess of 53.2 cubic metres over any 24-hour period and the organic loading is not in excess of 13.3 kilograms of five-day biochemical oxygen demand over any 24-hour period and the release of offensive odours is minimized.
- The draft Environment Act Licence contains a Clause that requires that the Licencee maintain a record of all wastewater pumped out and hauled from the holding tank system, including the number of loads on a daily and weekly basis, the volume of each load, the name of the hauler, and the name and location of the licenced wastewater treatment facility to which the wastewater was transferred for treatment and that an annual report of all the waste hauling information be submitted to the Director by the 15th of January of the following year.

Conservation – Parks and Natural Areas Branch

- *The Branch has no comments to offer.*

Conservation – Sustainable Resource and Policy Management Branch

- *No concerns.*

Conservation – Wildlife Branch

- *No concerns.*

Culture, Heritage, Tourism and Sport – Historic Resources Branch

- *No concerns.*

Infrastructure and Transportation

- *No concerns.*

Local Government – Provincial Planning Services Branch

- *The proposal is to construct and operate a wastewater collection system and wastewater holding tank that will serve 120-unit seasonal RV Park in the Winnipeg Beach Provincial Park located within the Town of Winnipeg Beach. However, the proposal is exempt from the policies and provisions of the Town of Winnipeg Beach Development Plan and Zoning By-law because it is located within a Provincial Park.*
- *We understand that the wastewater collected at this site is not being transferred to the Winnipeg Beach lagoon (located adjacent to the property) due to capacity issues. The holding tank waste will be transferred to the Dunnottar lagoon, about five miles away.*
- *What is the long term strategy to handle waste? Are there future plans to hook up wastewater services to the Winnipeg Beach wastewater lagoon once capacity issues are addressed? Are there any plans to relocate the Winnipeg Beach lagoon which may also address potential odour issues to this site and the Town of Winnipeg Beach as a whole? Have there been any discussions between the Parks Branch and the Council of Winnipeg Beach to collaborate to develop a shared wastewater treatment facility?*

Proponent Response – May 19, 2010

- The wastewater collection system is designed to enable connection to the Town of Winnipeg Beach system if additional lagoon capacity is added to their system in the future. Alternatively, if the Gimli regional system is extended to Winnipeg Beach, the RV Park would connect to this system;
- Any plans to relocate the Winnipeg Beach lagoon would be the decision of their Town Council; and
- Discussions about shared sewer and water services have been held with the Town of Winnipeg Beach since the onset of this project. Any expansion or rehabilitation of the Town of Winnipeg Beach's wastewater treatment system would have to be initiated by the Town since they are the owner and operator of the system and would be the largest contributor of wastewater to the shared system.

Disposition:

- The draft Environment Act Licence contains Clauses that require that the Licencee direct all sewage generated within the Winnipeg Beach Campground

- toward the wastewater collection and holding tank system or other approved sewage treatment facilities.
- The draft Environment Act Licence contains a Clause that requires that the Licencee, prior to commencing use of the wastewater holding tank system, enter into a service agreement(s) with a service provider(s) for receiving and providing treatment of the sewage and wastewater from the holding tanks of this Development at an off-site wastewater treatment facility operating under the authority of a Licence issued under The Environment Act thereby allowing some flexibility as to where the wastewater is delivered for treatment.

Science, Technology, Energy & Mines – Mines Branch

- *No concerns.*

Water Stewardship

April 20, 2010

- *The Water Rights Act indicates that no person shall control water or construct, establish or maintain any “water control works” unless he or she holds a valid licence to do so. “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, an application for a Water Rights Licence to Construct Water Control Works is required. Application forms are available from any office of Manitoba Water Stewardship.*
 - *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.*
- *Manitoba Water Stewardship’s Office of Drinking Water has performed a review of the design of the sewer system required under Section 7 (1) of Regulation 331/88R under The Public Health Act. The Office of Drinking Water has recommended a Certificate of Approval be issued for the collection system.*

- *Installing water saving devices like low-flow shower heads, and low flow toilets reduces the amount of liquid in wastewater collection systems and increases efficiency in municipal wastewater systems. The Department recommends for the proponent to install water saving devices to help maintain the health of Lake Winnipeg.*
- *The Proposal does not appear to indicate how the retention pond will be managed or if the discharge pipe to the lake will be directionally drilled or trenched. If the pipe is ending at the lake, the Department prefers the implementation of directional drilling.*
- *The Department recommends an Environment Act Licence to include the following requirements:*
 - *Manitoba Water Stewardship is concerned with any discharges that have the potential to impact the aquatic environment and/or restrict present and future uses of the water. The proponent shall actively participate in any future watershed based management study, plan/or nutrient reduction program, approved by the Director, Water Science and Management Branch, Manitoba Water Stewardship.*

Proponent Response – May 19, 2010

- Geoff Reimer was in attendance at our project initiation meeting and advised that no drainage licence is required for this project, however, retention storage has been provided in accordance with Water Stewardship guidelines and calculations were forwarded to Geoff for his records;
- Erosion and sediment control will be utilized where required. The retention pond will be sodded immediately upon completion of construction;
- A Licence to Construct the sewer and water systems has been issued by the Office of Drinking Water;
- Shower heads are low flow (1.5 GPM) and showers are coin operated to promote water conservation;
- The outlet culvert will be installed by open-cut method. The pond will be operated and maintained by local Parks operations staff; and
- Parks Branch will participate in any future watershed based management study, plan/or nutrient reduction program, approved by the Director, Water Science and Management Branch, Manitoba Water Stewardship.

June 10, 2010

- *It appears that the proponent will install the culvert from the retention pond via the open-cut method of horizontal drilling. If this activity does not conform to one of the Operational Statements of the Department of Fisheries and Oceans*

Canada then it should be reviewed by the Department of Fisheries and Oceans Canada.

Disposition:

- The draft Environment Act Licence contains a Clause that requires that the Licencee implement effective erosion and sediment control measures during construction and until vegetation is established.

COMMENTS FROM FEDERAL REPRESENTATION:

Canadian Environmental Assessment Agency

- *The project information that was provided has been reviewed by the Canadian Environmental Assessment Agency (CEAA).*
- *DFO has provided a letter of advice for you to review. It has listed mitigation measures that would aid in protecting fish habitat.*
- *Application of the Canadian Environmental Assessment Act (the Act) will not be required.*

Disposition:

- The draft Environment Act Licence contains a Clause that requires that the Licencee operate, maintain and store all materials and equipment in a manner that prevents any deleterious substances from entering the associated waterways and that a emergency spill kit for in water use be available on-site during construction.
- The draft Environment Act Licence contains Clauses that require that the Licencee operate machinery on land, above the ordinary high water mark and in a manner that minimizes disturbance to the banks of the water body and implement effective erosion and sediment control measures during construction and until vegetation is established.

PUBLIC HEARING:

A public hearing was not requested.

RECOMMENDATION:

Issue an Environment Act Licence in accordance with the attached draft. Enforcement of the components of the Licence that relate to the installation of the holding tank system should be assigned to the Environmental Assessment and Licensing Branch until the installation has been completed.

PREPARED BY:

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August 18, 2010

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