

## **SUMMARY OF COMMENTS/RECOMMENDATIONS**

**PROPONENT:** Manitoba Hydro  
**PROPOSAL NAME:** Kelsey Generating Station – Portable WWTP Installation  
**CLASS OF DEVELOPMENT:** 2  
**TYPE OF DEVELOPMENT:** Sewage Treatment Plant  
**CLIENT FILE NO.:** 5423.00

### **OVERVIEW:**

On August 14, 2009, the Department received an Environment Act Proposal (EAP) from Manitoba Hydro for the construction, installation and operation of a sewage treatment system at the Kelsey Generating Station located in 24-81-6EPM. The sewage treatment system will consist of a newly installed membrane bio-reactor portable package sewage treatment plant that will be connected to the existing sewage treatment plant and UV disinfection system. A new sludge dewatering system will be constructed to replace the previously used sludge pit. Treated wastewater from the sewage treatment system will be discharged to the Nelson River via an existing outfall while dewatered sludge will be disposed of at a waste disposal ground. The sequencing batch reactor component of the existing sewage treatment plant is not proposed for decommissioning as the membrane bio-reactor portable package sewage treatment plant may be removed from the site upon completion of current and near future construction activities in at the Generating Station, at which time the sequencing batch reactor may be returned to operation.

The Department, on August 24, 2009, placed copies of the EAP report in the Public Registries located at 123 Main St. (Union Station), the Millennium Library, the Thompson Public Library and the Manitoba Eco-Network and provided copies of the EAP report to the Canadian Environmental Assessment Agency (CEAA) and TAC members. As well, the Department placed public notifications of the EAP in the Thompson Citizen on Friday, September 4, 2009. The newspaper and TAC notifications invited responses until October 2, 2009.

There were a few comments from the TAC were received while there was no public input.

### **COMMENTS FROM THE PUBLIC:**

There were no comments from the public.

## **COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:**

### **Agriculture, Food and Rural Initiatives**

- *No concerns.*

### **Aboriginal Relations Branch – Conservation**

- *The Government of Manitoba has undertaken a Crown Consultation process regarding the proposed Kelsey Re-runnering Project. It is noted in the above mentioned proposal (File 5423.00) that the “the WWTP alterations are being implemented to ensure that the system complies with licensing requirements during the current re-runnering project. This project is expected to have a duration of four years, and be completed in 2012. It will temporarily increase the site population to 120 persons. The current facility operates under the terms of Environment Act Licence 1580R.”*

*Therefore, the WWTP alterations must be included in the overall Kelsey Re-runnering Project Crown Consultations.*

- *The Government of Manitoba has a duty to consult in a meaningful way with First Nations, Métis communities and other aboriginal communities when any proposed provincial law, regulation, decision or action may infringe upon or adversely affect the exercise of a treaty or aboriginal right of the First Nation, Métis community or other aboriginal community.*

#### Disposition:

- The draft Environment Act Licence contains clauses that provide limits, terms and conditions that are conventional for sewage treatment plants in Manitoba.
- The existing sewage treatment plant is licenced under Environment Act Licence No. 1580 RR. That licence identifies daily hydraulic and organic load limits. It is understood that once the re-runnering work is completed the crews will depart, leaving only the usual significantly smaller number of Manitoba Hydro employees to use the previously existing wastewater management system that will operate under that Licence;
- The re-runnering project is already underway and therefore proceeding to licence this supplementary sewage treatment plant as soon as possible so it can be installed and commence operation would reduce the likelihood of the occurrence of negative environmental or public health impacts.

### **Environmental Services Branch – Conservation**

- *The proposal indicates a portable wastewater treatment plant will be installed for the duration of the re-runnering project, to then be available for relocation to another project site. The proposal indicates that the wastewater effluent from the current SBR wastewater treatment system exceeds Environment Act 1580R*

*licensed limits, therefore what is proposed to prevent the exceedances if/when the portable package treatment plant is to be removed?*

- *The project background indicates that the re-runnering project will run for 4 years to be completed in 2012. Is this project already underway, or when is the proposed start day of the project?*
- *The dewatered sludge is proposed to be hauled to a landfill at 20% solids. Please confirm in writing:*
  - a. *which landfill is to accept the dewatered sludge;*
  - b. *they are willing to accept the dewatered sludge;*
  - c. *the dewatered sludge at 20% solids will comply with the requirements of Manitoba Regulation 150/91 Waste Disposal Grounds Regulation with respect to 150 mm slump; and*
  - d. *what is proposed if the sludge does not achieve either the 20% solids stated or the required 150 slump.*

Disposition:

- The existing sewage treatment plant is licenced under Environment Act Licence No. 1580 RR. That licence identifies daily hydraulic and organic load limits. It is understood that once the re-runnering work is completed the crews will depart, leaving only the usual significantly smaller number of Manitoba Hydro employees to use the previously existing wastewater management system that will operate under that Licence;
- The re-runnering project is likely already underway and therefore proceeding to licence this supplementary sewage treatment plant as soon as possible so it can be installed and commence operation would reduce the likelihood of the occurrence of negative environmental or public health impacts;
- The draft Environment Act Licence contains clauses that require that all sludge must be de-watered to the extent that it is not considered to be a liquid waste and that such dewatered sludge is not stored at the Kelsey Generating Station Powerhouse and Townsite area beyond the design sludge storage capacity of the sewage treatment plant and sludge dewatering system;
- The draft Environment Act Licence contains a clause that requires that primary screenings and dewatered sewage sludge are disposed of in a waste disposal ground operated under either a permit issued in accordance with *Manitoba Regulation 150/91* or any future amendment thereof or under the authority of a Licence issued under The Environment Act;
- The draft Environment Act Licence provides General Specifications that will require the Licencee to take supplementary action to prevent the operation of the Development from being non-compliant. Similar to situations where effluent discharge and quality limits are not achieved, supplementary action(s) by the Licencee with respect to sludge management may be necessary.

### **Parks and Natural Areas Branch – Conservation**

- *No concerns.*

### **Pollution Prevention Branch – Conservation**

- *No concerns.*

### **Sustainable Resource Management Branch – Conservation**

- *No concerns.*

### **Historic Resources Branch – Culture, Heritage, Tourism and Sport**

- *No concerns.*
- *If at any time however, significant heritage resources are recorded in association with these lands during development, the Historic Resources Branch may require that an acceptable heritage resource management strategy be implemented by the developer to mitigate the affects of development on the heritage resources.*

### **Infrastructure and Transportation**

- *No concerns.*

### **Science, Technology, Energy and Mines**

- *No concerns.*

### **Water Stewardship**

- *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.*
- *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 recommends that an Environment Act Licence include the following requirement:*
  - *If potable water is installed into any of the wastewater treatment buildings, the implementation of cross connection control devices in accordance with the Manitoba Plumbing Code 128/2006 shall be required.*

Disposition:

- The draft Environment Act Licence contains clauses that provide limits, terms and conditions that are conventional for sewage treatment plants in Manitoba.

**COMMENTS FROM FEDERAL REPRESENTATION:**

**Canadian Environmental Assessment Agency**

- *Based on the responses to the CEAA survey, application of The Canadian Environmental Assessment Act with respect to this proposal will not be required. Health Canada and Fisheries and Oceans may provide expert advice on this project if specifically requested.*

**PUBLIC HEARING:**

A public hearing was not requested.

**RECOMMENDATION:**

Issue an Environment Act Licence in accordance with the attached draft. Once the sewage treatment plant and sludge dewatering system are operational, an inspection should be completed by an Environment Officer from the Environmental Assessment and Licensing Branch prior to transferring the Licence to the Region for enforcement.

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