

## **SUMMARY OF COMMENTS/RECOMMENDATIONS**

**PROPOSER:** PTI Premium Camp Services Ltd.  
**PROPOSAL NAME:** PTI Work Camp – Melita Wastewater Holding Tank System  
**CLASS OF DEVELOPMENT:** 2  
**TYPE OF DEVELOPMENT:** Waste Treatment and Storage  
**CLIENT FILE NO.:** 5668.00

### **OVERVIEW:**

On July 29, 2013 the Department received a Proposal from Burns Maendel Consulting Engineers Ltd. on behalf of PTI Premium Camp Services Ltd. pursuant to *The Environment Act* for the construction and operation of a wastewater collection system and a wastewater holding tank system located on the NW1/4 SEC 6, TWP 4, RGE 26 WPM, LOT 2, Block 1, Plan 728, to service the Melita temporary construction camp. Wastewater from the holding tank system will be hauled by licensed septic hauler trucks to the Pierson Lagoon and Reston Lagoon facilities for treatment.

On October 4, 2013, Manitoba Conservation and Water Stewardship placed copies of the Proposal in the Public Registries located at Legislative Library, 200 Vaughan St., Winnipeg; Millennium Public Library, 4<sup>th</sup> Floor, 251 Donald St., Winnipeg; Online Registry, <http://www.gov.mb.ca/conservation/eal/registries/index.html>. Copies of the Proposal were also provided to the Technical Advisory Committee (TAC) members. The Department placed public notification of the Proposal in the Melita New Era on Friday October 4, 2013. The newspaper and TAC notifications invited responses until October 18, 2013.

On October 24, 2013, Manitoba Conservation and Water Stewardship forwarded requests for additional information from the TAC to the proponent's consultant. On November 6, 2013, the consultant submitted responses to the comments and requests from the TAC. On November 12, 2013, consultant's responses were distributed to the participating TAC for review and comment.

On November 28, 2013, Manitoba Conservation and Water Stewardship forwarded comments/requests for supplementary information from the TAC to the proponent's consultant. On December 2, 2013, the consultant submitted responses to the comments and requests from the TAC.

All additional information necessary for the review was placed in the Public Registries.

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

No comments were received from the public.

**COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE (TAC):**

**Manitoba Family Services and Labour - Office of the Fire Commissioner  
(October 15, 2013)**

- *No concerns*

**Manitoba Local Government - Community & Regional Planning (October 8, 2013)**

- *No concerns*

**Manitoba Conservation and Water Stewardship - Parks and Natural Areas Branch  
(October 7, 2013)**

- *No concerns*

**Manitoba Conservation and Water Stewardship - Water Control Works and  
Drainage Licensing Section (October 15, 2013)**

- *No concerns*

**Manitoba Conservation and Water Stewardship - Watersheds and Protected Areas  
Branch (October 16, 2013)**

- *No concerns*

**Manitoba Conservation and Water Stewardship, Land Management and Planning –  
Lands Branch (October 21, 2013)**

- *No concerns*

**Manitoba Conservation and Water Stewardship – Office of Drinking Water  
(October 17, 2013)**

- *No concerns*

**Manitoba Conservation and Water Stewardship, Regulatory Services Branch,  
Water Use Licensing Section (October 5, 2013)**

- *Where they plan to service the site with potable water?*

**Proponent Response (October 7, 2013)**

- The current plans for servicing the site include a potable water approved reservoir and water distribution system; the distribution pumps will be located within the services building. Water will be hauled from the Town of Melita water treatment plant to the site where it will be stored and distributed via a private water distribution system. We have applied for and received a Permit to Construct or Alter a Public Water System.

**Disposition:**

- After receiving the additional information from the proponent, no further comments were received from Water Use Licensing Section of Regulatory Services Branch.

**Manitoba Conservation and Water Stewardship - Lands Branch (October 16, 2013)**

- *The Lands Branch defers comment to the Environmental Compliance and Enforcement section of Conservation and Water Stewardship.*

**Manitoba Conservation and Water Stewardship – Environmental Compliance and Enforcement Branch (October 17, 2013 and November 26, 2013)**

- *We noted that the PTI camp services authority already accepted clearance from RM of Edward and Pipestone Municipality. We request the Burns Maendal Consulting to take precautionary approach and make sure that the maximum design limit for these proposed lagoons (Pierson, Reston) are not exceeded. We are also OK with Deloraine lagoon and Souris WWTP. However we have to make sure that in case of Hartney, the cut-off in the primary cell embankment linking to secondary cells is closed as it allows untreated sewage to run directly to secondary. Prior to that Hartney lagoon should not be accepting additional sewage loads.*
- *We don't have any issue at this point of time. HOWEVER, we maintain the position that HARTNEY LAGOON should not be allowed by PTI Campground authority to accept any wastewater in future until clearance is received from MB Conservation, Western region.*

**Proponent's Response (December 2, 2013)**

- We have noted the above comment and do not plan to utilize the Hartney lagoon for any wastewater disposal. In the event that the Pierson and Reston Lagoons cannot accept the wastewater in the future we will seek out other wastewater disposal locations. However, we do not anticipate this being a problem, as the Pierson and Reston Lagoons have both stated that they have ample capacity to accept the wastewater.

**Disposition:**

- No actions needed.

**Manitoba Infrastructure and Transportation– Highway Planning and Design Branch, Environmental Services Section (October 4, 2013)**

- *The proposed project may require access to PTH 3 and/or PTH 83. As such, the proponent should be informed that, under the Highways Protection Act, any new, modified or relocated access connection onto a PTH, including any change in use, will require a permit from Highway Traffic Board.*

- *A permit may also be required for any construction, above or below ground level, within 38.1m (125 ft) controlled area or 152.4 m (500ft) controlled circle or for any plantings within 15.2 m (50 ft) from the edge of the right of way of PTH 3 and PTH 83.*
- *Permit applications can be obtained by contacting Ashley Beck at (204) 726-7000 or by email at [Ashlev.Beck@cirov.mb.ca](mailto:Ashlev.Beck@cirov.mb.ca).*
- *The proposed project may also require a Drainage Study and a Traffic Impact Study to determine if any on-highway improvements are required.*
- *If further information is required, please contact Brian Hickman, Regional Planning Technologist, at (204) 726-6822.*

#### Proponent Response (November 6, 2013)

- *The drawings included with the EAP application clearly show the locations of the access points for the development. Three access locations are required for this development, two of which are to the north onto Centre Street. Centre Street is a street within the jurisdiction of the Town of Melita. The third access will be directly onto PTH 83. This is an existing access that previously provided access to the residence on this site. The PTH 83 access will be utilized by vehicles providing supplies to the facility as all service entrances are located on the south side of the facility. The majority of the traffic which includes the parking area for construction workers will access the site from Centre Street.*

*We were unaware that an application to the Highway Traffic Board is required for the development. We will complete the application and submit for the change in use of the existing access.*

- *There is no construction proposed within the control zone setbacks.*
- *All drainage water from the development will continue to be directed towards the southeast into the existing natural watercourse which drains beneath Front Street and into the Souris River without impacting any highway infrastructure.*

#### Further Comments (November 19, 2013)

- *When the proponent applies for the change of use in access on PTH 83, a Traffic Impact Study will be requested by the MIT Regional Office as part of the comments to The Highway Traffic Board.*
- *A sealed Drainage Study should be sent to the Regional Technical Service Engineer for review to determine if the drainage will not impact any highway infrastructure.*

Proponent's Response (December 2, 2013)

- The application for change of use in access on PTH 83 has already been submitted to Manitoba Infrastructure and Transportation. We have attached the response we received from MIT on November 25, 2013 for your review. As per the response, the property is adjacent to a portion of P.T.H No. 83 that has been removed from Limited Access Status, and is therefore not under the jurisdiction of the Highway Traffic Board. Furthermore, the Town of Melita has already approved the proposed development. We therefore anticipate that a Traffic Impact Study will not be required.
- We will submit our drainage design and rational to the Regional Technical Service Engineer for review and approval. As previously discussed the site drains towards the south, under Fort Street/CN rail tracks and directly into the Souris River. I understand the closest MIT crossing that could be affected is approximately 5 miles downstream near Napinka.

Disposition:

- The draft licence includes a clause that requires the licence to obtain all necessary provincial and federal permits and approvals for construction of relevant components of the Development prior to commencement of construction.

**Manitoba Conservation and Water Stewardship – Wildlife Branch (October 18, 2013)**

- *The proponent should be aware that Great Plains Toad, a species protected under the Endangered Species Act, has been recorded NW 6-4-26W.*
- *Also, the proponent should prepare a plan in case Great Plains Toads are found during construction.*
- *The Wildlife Branch would like to review this plan once it is made.*
- *The following concerns pertain to Section 4.1 where the proponent indicates that the plant life consists of common grasses. WB would like to know which grasses those are. If the land had been previously cultivated or disturbed then those grasses are likely Kentucky Blue Grass, Quack Grass and Smooth Brome. However if the common grasses consist of native grasses like Needle Grass or Blue Grama grass, we would be concerned that the location could have remnant prairie. WB would like the proponent to please clarify this.*
- *Also, it seems that the proponent has possibly missed potential wildlife conflicts by saying the area is built up therefore there isn't wildlife. WB would like to see some indication that they looked for signs of wildlife. Birds, deer and small animals like*

*frogs can use areas around development and we would like to see them properly addressed here.*

### **Proponent Response (November 6, 2013)**

- In way of clarification, we advise that the site work has been completed. The site clearing and grading was executed in November 2012 in preparation for the lodge complex. PTI Group sought approval from the authorities having jurisdiction prior to commencing with the construction activities. They had approval from the Town of Melita as well as the Office of the Fire Commissioner (OFC) to commence with the site grading.

As approval for the site was already granted by the Town of Melita and OFC, construction commenced in late 2012, the site grading is currently 100% complete. The original intent of the design for the development was to connect to the Town of Melita sewer system. In this case an EAP would not have been triggered and the project would have commenced through to construction. During the design we determined that the Town of Melita does not currently have capacity to accept the wastewater from this facility and as such the design was revised to include the holding tank.

Regarding the native grasses, the site had previously been established as a residential acreage. There was a house, garage and five outbuildings on the site when it was purchased by the PTI Group, they have since been demolished. We understand the previous owner had maintained the yard site. Therefore, we do not anticipate the site being a sanctuary for native grasses. There is however an undeveloped swale running along the east side of the development which may contain native grasses. This area will not be developed, so grasses and wildlife in the swale will not be impacted.

Similarly, as the site was previously established as an acreage and was mowed, it would not be an ideal habitat for the Great Plains Toad. For reference we have provided the photos.

### **Disposition:**

- After receiving the additional information from the proponent, no further comments were received from Wildlife Branch.

### **Manitoba Health - Prairie Mountain Health (October 21, 2013)**

- *Have the following general comments, please ensure:*
  - *Odour control and monitoring.*

- *Any discharge of effluent is in compliance with Manitoba Environment's guidelines.*
- *Ongoing reporting and appropriate disposal of all hazardous wastes.*
- *Leachate, soil and groundwater monitoring.*
- *Containment design provides the best possible groundwater protection for the area.*
- *Prevention of pollutant or contaminated wastewaters from entering sewage disposal and municipal ditch systems.*
- *Fencing, gates, and warning signs included to ensure public safety, in case of unsupervised public access to the development.*

#### Proponent Response (November 6, 2013)

- We do not anticipate any odour issues as the wastewater will be collected and stored within an above ground insulated steel holding tank. The wastewater will be transferred from the holding tank to a licensed sewage hauler tanker truck via a transfer pump. The collection, storage and transportation systems are completely contained with minimal exposure to the atmosphere; therefore we do not consider odour to be of concern.
- Question/comment not understood. There will not be any discharge of effluent from the site as all wastewater will be stored and hauled off site to a licensed facility. As the effluent is being hauled to lagoon facilities licensed by Manitoba Conservation, we anticipate that full compliance with Manitoba.
- As the lagoon facilities are licensed by Manitoba Conservation, we expect full compliance with reporting and disposal procedures. A licensed hauler, Souris Pumping, has been contracted to haul all wastewater from the development. We do not anticipate any additional disposal of hazardous waste.
- Given that wastewater is being stored in an enclosed above-ground insulated tank, there are minimal opportunities for soil or groundwater contamination. As an extra precautionary measure, the holding tank will have secondary containment installed to mitigate the environmental impact of any potential spill. The secondary containment has been designed with a capacity of 110% of the tank volume. This information was included in section 6.2 of the EAP. The only other potential source of contamination would be the small diesel storage tank on the generator. This tank is also a double walled containment tank; there is a low probability of leaking and contamination of the groundwater. Other than these two very low potential sources of contamination, we do not anticipate any other potential contaminants and therefore are of the opinion that leachate, soil and groundwater monitoring are not required.
- Yes, we agree and have designed and provided secondary containment for both the wastewater holding tank as well as the diesel powered generator. As per the response

to the previous question, secondary containment will be installed to protect the groundwater and soil from any possible contamination.

- As per the response to the previous two questions, wastewater is stored in an above-ground insulated tank, with secondary containment being installed around it. Transfer to the sewage hauler is accomplished via a transfer pump. Therefore, wastewater disposal for this site can be considered a closed system.
- The secondary containment around the holding tank effectively functions as a fence providing isolation from the rest of the camp. The site itself is also clearly marked as a work camp, and will be identified by a large sign at the entrance. We believe this comment is appropriate for a lagoon; the EAP filed is for a holding tank.

Disposition:

- After receiving the additional information from the proponent, no further comments were received from Manitoba Health.

**Manitoba Conservation and Water Stewardship, Fisheries Science and Fish Culture Section, Fisheries Branch (October 27, 2013)**

- *Fisheries Branch has reviewed this proposal for a temporary work camp in Melita located at (W1/2 6-4-26 W). Sewage generated at the camp will be directed to a lift station which conveys the sewage via a force main to a 31,500 US Gallon holding tank which will be held within a lined secondary containment area. The sewage will be transported by licensed septic hauler trucks to the Pierson and Reston Lagoon facilities. While it does not appear that there are any fisheries concerns with the temporary camp and proposed handling of storage, it is important that the receiving facilities have the capacity to hold and treat the additional sewage.*

Disposition:

- The proponent has received permission to haul wastewater to the Pierson and Reston lagoons to treat additional sewage.

**Manitoba Conservation and Water Stewardship, Water Quality Management Section, Water Science and Management Branch (October 23, 2013)**

- *The proposal states that the proposed development is to occur on the W 1/2 6-4-26. The Certificates of Title in Appendix A indicate NW 6-4-26.*
  - *The conditional use order resolution #2012-029 from the Town of Melita states that the proponent has permission for a 240 man camp (Appendix B). The proposal states that the design capacity of the*



*holding tank is for 254 workers plus 20 additional local people, and with the ability to increase to 326 people in the future (page 1).*

- *The design volume of wastewater is 18,330 US gal/day. The proposal states that daily hauling will take place to accommodate the design load. The proponent must ensure that they have permission from enough lagoons to dump the daily hauls taking place to accommodate the design load.*
  - *The executive summary states that the sewage will be treated at the Pierson and Reston Lagoon facilities. Page 6, section 5.3.2 of the proposal states that the treatment of sewage will take place at the Pierson and Reston Lagoon facilities.*
  - *Appendix B August 21, 2013 letter from Lisa Pierce regarding the Pierson Lagoon facility appears to indicate that they will accept a maximum of 6,600 imperial gal/day or 7926 US gal/day.*
  - *Appendix B September 5, 2013 letter from June Greggor regarding the Reston Lagoon appears to indicate that they will accept a maximum of 8,000 US gal/day.*
  - *Page 6 of proposal states that further approval is also being sought to dispose of 6,000 gal/d of sewage at the Deloraine lagoon facility in the RM of Winchester. If there are any further concerns about capacity, there is room for sewage disposal at the Hartney lagoon facility and the Souris WWTP.*

#### Proponent Response (November 6, 2013)

- The lodge will be constructed at the NW¼ 6-4-26. For the purposes of identifying the legal description of the proposed development please use NW¼ 6-4-26.
- It was an oversight on our part that the Conditional Use resolution was for a 240 man camp while we have proposed to construct a 254 man camp. We will notify the Town of Melita and seek approval for the proposed 254 man camp. The local workers were included in the EAP as we assumed they would be using the site facilities while at work. This decision was made to be conservative with the storage volume requirements.

The anticipated increase to 326 people was included in order to illustrate that the wastewater storage tank has more capacity than necessary. If PTI decides to expand their camp in the future, they will obtain approval through the necessary authorities having jurisdiction. It is anticipated that by this time the Town of Melita will have

upgraded their lagoon facility and the camp will be connected to the Town infrastructure.

- The 18 330 US gal/day (15260 imgal/day) volume of wastewater is the anticipated future loading if PTI proceeds to expand the camp to have capacity for 326 people. If the expansion takes place in the future, PTI will ensure that they have approval from enough lagoons to be able to accommodate the increased loading. We do not anticipate the future expansion will occur until the Town of Melita has upgraded their wastewater infrastructure.

Current design loading is anticipated at 14290 US gal/day (11900 imgal/day) and we have hauling approved for 17532 US gal/day (14600 imgal/day). We have permission for 7925 US gal/day (6600 imgal/day) from the Pierson Lagoon and 9607 US gal/day (8000 imgal/day) from the Reston Lagoon. Therefore, the design loading of 14290 US gal/day (11900 imgal/day) is well under the 17 532 US gal/day (14600 imgal/day) available capacity.

The lagoons accepting wastewater from the development have been investigated for capacity. This information was provided as part of the EAP submission. We have attached written correspondence from both the RM of Edwards and the RM of Pipestone regarding the available capacity. The RM of Pipestone has stated that they do not anticipate any problems with capacity, and if there are any issues PTI and the licensed hauler will be notified in advance. The contact for the Pierson Lagoon stated that there is a large volume of storage available, as the lagoon received a major upgrade during the 1990's. There is a third cell available that is used strictly for overflow. We have received and attached correspondence from both lagoons confirming these statements.

Disposition:

- After receiving the additional information from the proponent, no further comments were received from Water Science and Management Branch.

**COMMENTS FROM FEDERAL REPRESENTATION:**

- No comments were received.
- The application of the *Canadian Environmental Assessment Act (the Act)* will not be required for this project.

**PUBLIC HEARING:**

- A public hearing is not recommended because no comments were received from the public.

**CROWN-ABORIGINAL CONSULTATION:**

The Government of Manitoba recognizes it 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 that First Nation, Métis community or other Aboriginal community.

There is no aboriginal community nearby the wastewater collection system and would be no infringement of aboriginal or treaty rights under Section 35 of the Constitution Act, 1982. Therefore, it is concluded that Crown-Aboriginal consultation is not required for the project.

**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 Approvals Branch until the installation has been completed.

**PREPARED BY:**

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December 11, 2013

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