



ONTARIO  
RIVERS  
ALLIANCE



Izaak Walton  
Fly Fishing Club



Trout Unlimited Canada



Greg Clark Chapter

3 June 2022

Aziz Ahmed, Manager  
Municipal Water & Wastewater Permissions  
Ministry of Environment, Conservation & Parks  
135 St Clair Avenue W  
Toronto, ON M4V 1P5

By email to: [Aziz.Ahmed@Ontario.ca](mailto:Aziz.Ahmed@Ontario.ca)

Re: Environmental Compliance Approval NUMBER 7877-CALRZU  
Erin Water Resource Recovery Facility

Dear Mr. Ahmed:

First, the Coalition for the West Credit River (Coalition) would like to express our deepest appreciation that you and your staff worked with our Technical Team over the last several months to incorporate some of our recommendations into the Environmental Compliance Approval (ECA). However, we are concerned that our key recommendations for improvements to the draft ECA, received by you on 2 May, were not reflected in the ECA approved on 3 May 2022.

We understand an amendment will be required when the WSP cooling system design and operating plan are incorporated into the ECA, and Section 12 of the ECA provides for "*Limited Operational Flexibility*" (LOF) so that the owner can undertake any modification that is pre-authorized as part of the Approval. We respectfully request that our comments submitted to you on 2 May, as well as those below, are incorporated into the revised ECA through either the amendment or LOF mechanism.

We are therefore submitting the following improvements which are critical to the health of this highly valued native Brook Trout population and the West Credit River ecosystem - a pristine, Policy 1 coldwater stream:

**Recommendation 1:** Section 11.1 - The effluent temperature objective be 17°C from July 1 to September 30 and 9°C from October 1 to November 30.

Rationale: The summer effluent temperature objective is set at or below 19°C; however, the cooling system should run continuously until the effluent entering the final pumping station reaches 18°C, but preferably even lower to 17°C to ensure stream temperature stays at or below 19°C. This will ensure Brook Trout and their sensitive biological temperature requirements are met. Additionally, our 2021 effluent temperature study of 5 local wastewater treatment facilities revealed that elevated effluent temperatures persist right through spawning season and into mid-November. This information can be shared with you and your staff upon request.

**Recommendation 2:** Section 11.2 (a) and Schedule C - The Dissolved Oxygen compliance limit in the final effluent be increased from 4 mg/L to a minimum of 6 mg/L, but preferably 9.5 mg/L as per the [Canadian Council of Ministers of the Environment Guidelines](#).

**Recommendation 3:** Section 11.2 (a) be amended by removing the crossed-out text and adding the underlined text to read as follows: *“If dissolved oxygen level in the effluent drops below 4 mg/L 9.5 mg/L, and ~~sustained for more than 12 hours~~, air shall be introduced into the effluent at the final effluent pumping station to bring the dissolved oxygen in the effluent above ~~4 mg/L~~ 9.5 mg/L...”*.

Rationale for Recommendations 2 & 3: Brook Trout cannot persist in water that has a dissolved oxygen concentration of 4 mg/L, let alone sustain themselves at an even lower dissolved oxygen level for 12 hours.

**Recommendation 4:** Section 10.6 - The ECA specify that CVC post all water quality and effluent temperature monitoring data to their website in real-time so the public can be assured of the health and safety of the Brook Trout and West Credit River ecosystem.

Rationale: The ECA currently allows a 2-week time delay to Quality Control the real-time monitoring data before it's posted to the Town's website. This is not real-time data for the public, nor does it provide transparency in the operation of the plant. The CVC currently provides all data at its water quality stations in real-time on its website and quality controls the data with an update after it is released. These stations should be no different.

**Recommendation 5:** Sections 5.7 & 6.7 be amended by removing the crossed-out section and adding the underlined text, to read as follows: *“The Owner shall develop a notification procedure in consultation with the District Manager, SAC and CVC, and notify ~~the public and downstream water users that may be adversely impacted by~~ all those who have registered on the Town of Erin website to receive Bypass Event emails in real-time in the event of an Overflow or Bypass Event.”*

Rationale: The wording of the current text allows the “Owner” a judgement call on whether downstream water users may be adversely impacted by a Bypass or Overflow event. Only the property owner and the Brook Trout will know whether he/she has been adversely impacted by a bypass. A highly effective model for the Town of Erin to follow is the [City of Sudbury Bypass Alerts](#), where the public can register on the City's website to receive email notification of sewer Bypass Alerts or wastewater overflows in real-time. It is a very successful model and has been in use since 2014.

**Recommendation 6:** The two downstream monitoring stations be located at Winston Churchill Boulevard (WCB), at the downstream edge of the culvert, and 200m downstream.

Rationale: The current planned locations for downstream monitoring stations in Schedule D, Surface Water, are at 150m and 700m downstream of the effluent diffuser. At 200m downstream, the effluent should be fully mixed. A prime Brook Trout spawning and nursery habitat lies between the downstream edge of the WCB culvert, at approximately 35m from the diffuser, and extends to approximately 200m downstream of the diffuser. Therefore, the monitoring stations will be more relevant if positioned to effectively monitor and protect this sensitive spawning and nursery habitat located within 200m of the diffuser. Our technical experience and knowledge from working and fishing in the West Credit River is why our understanding of this system can be very valuable as a commenting and participating stakeholder.

The new effluent cooling system is an appropriate means to alleviate concerns regarding the long-term implications of the new wastewater treatment plant on Brook Trout in the West Credit River. As it will be a new approach for effluent temperature mitigation, we recommend that all outside clarifier tanks also be shaded to help keep effluent cool during the treatment process. This will improve cooling efficiency and save on chiller operating costs.

Please be advised that the Coalition is seeking support from the Region of Peel to be included as a commenting and participating stakeholder in the drafting of the Operations & Maintenance Manual.

The Coalition respectfully requests that you incorporate the above recommendations into the final ECA at your first opportunity. We look forward to your response.

Respectfully,

A handwritten signature in cursive script that reads "Judy Mabee".

Judy Mabee  
President, Belfountain Community Organization  
Chair, Coalition for the West Credit River  
(416) 670-3879

Cc: Nando Iannicca, Regional Chair, Region of Peel  
Ian Sinclair, Regional Councillor, Region of Peel  
Mayor Allan Thompson, Town of Caledon