



ONTARIO  
RIVERS  
ALLIANCE



Izaak Walton  
Fly Fishing Club



Trout Unlimited Canada



Greg Clark Chapter

3 June 2022

Regional Municipality of Peel  
10 Peel Centre Drive, Suite A  
Brampton, ON L6T 4B9

Attention: Regional Clerk

By Email: [Council@PeelRegion.ca](mailto:Council@PeelRegion.ca)

Re: Delegation Request - Erin Water Resource Recovery Facility

Dear Region of Peel Council Members:

The Coalition for the West Credit River (Coalition) is requesting an opportunity for Mark Heaton of Ontario Streams to delegate to Council, including a slide presentation, at your next Regional Council Meeting, which I understand will take place on 9 June 2022.

### **Background Information:**

The Coalition is very appreciative of your strong support in recommending to the Honourable David Piccini, Minister of Environment, Conservation Parks (MECP) and Mayor Allan Aills, Town of Erin, that our draft Monitoring and Adaptive Management Plan be integrated into the Environmental Compliance Approval (ECA). As you are likely aware, the ECA for the Erin Water Resource Recovery Facility was approved on 3 May 2022 by Aziz Ahmed, P.Eng., MECP Manager of Municipal Water & Wastewater Permissions, appointed for the purposes of Part II.1 of the *Environmental Protection Act*.

The Coalition was extremely pleased and appreciative that Mr. Ahmed and his staff worked with our Technical Team and incorporated some of our recommendations into the approved ECA, which included requiring an effluent cooling system to cool and maintain effluent temperature at 19°C or below, to notify any downstream water users that could be adversely impacted by a Bypass Event, ensure quarterly sewage Bypass Event reports are available to the public, annual performance reports published to the Town of Erin's website, and real-time online effluent temperature monitoring. However, when we responded to Mr. Ahmed with some key revisions to their draft ECA on 2 May, we were disappointed and concerned that in spite of a comment deadline not being communicated, none of those revisions were included in the approved ECA that was issued the next day.

We feel these improvements must be incorporated into the ECA as they are crucial to the health of this highly valued native Brook Trout population and the West Credit River ecosystem, a pristine Policy 1 coldwater stream. We are again requesting Peel Council's support to recommend incorporating the following improvements into the ECA:

**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 participating and commenting stakeholder.

**Recommendation 7:** The Coalition be included in the drafting of the Operations & Maintenance Manual (OMM) as a commenting and participating stakeholder.

Rationale: The Coalition's Technical Team (Team) is a value-added commenting stakeholder, with a proven track record of working with the MECP on technical issues that have resulted in a number of recommendations in our draft Monitoring and Adaptive Management Plan being incorporated into the ECA in one form or another. The Team also collected effluent temperature data at 5 local wastewater treatment facilities over the summer of 2021, and that data was used by MECP and CVC in the preparation of the ECA. The CVC has encouraged our Team to approach the Town of Erin for our involvement in the OMM. We would appreciate any support from Peel Councillors to encourage the Town of Erin to invite our Team to participate fully in the OMM.

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.

We thank you for your consideration and look forward to your response.

Respectfully,



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

Cc: Mayor Allan Thompson, Town of Caledon  
Tom Adams, Chair, Credit Valley Conservation  
Quentin Hanchard, CAO, Credit Valley Conservation