

**REASONS FOR NOT ACCEPTING THE CLEAN ENVIRONMENT
COMMISSION RECOMMENDATIONS**

The following Clean Environment Commission recommendations were not included in the City of Portage la Prairie's Licence for the alteration and operation of their Water Pollution Control Facility Licence No. 2543:

Recommendation 5.3.1

Phosphorus removal should be required to levels consistent with those established in other prairie cities including Regina, Moose Jaw, Saskatoon and Calgary.

Reason:

The Environmental Approvals Branch cannot support the requirement for phosphorus removal at the present time based on:

- our understanding of the contemporary science in the region;
- the relative contribution and impact of the additional loading to the Assiniboine River from the altered wastewater treatment facility;
- nutrients are not directly toxic;
- nutrient enrichment is reversible; and
- non-application of a key principle in the 'precautionary approach' of 'a threat of serious or irreversible harm' in reference to the recommendation.

The need for nutrient removal will be better understood on completion of the Assiniboine River studies and the Department's Nutrient Management Plan. On completion, additional controls if necessary, will be developed in a manner that is fair and equitable for all activities that contribute nutrients to the Assiniboine River Watershed or the Lake Winnipeg Basin. Reference to potential future nutrient removal has been included in the Licence.

Recommendation 5.3.2

Ammonia limits for the Water Pollution Control Facility should remain at the existing licenced levels.

Reason:

Additional influent loading to the Water Pollution Control Facility will occur as a result of the Simplot Potato Processing Plant operation. Additional secondary treatment capacity will be added; however, nutrient removal is not required at this time. Due to the additional loading, there may be an increase in the effluent ammonia loading to the Assiniboine River. Ammonia nitrogen loading limits to the Assiniboine River have been included in the Licence to ensure that the new proposed water quality objective for ammonia is complied with. The proposed objective reflects new scientific information. Compliance with the ammonia objective will protect aquatic life and the fishery. Additional river allocation requested by the Licencee has not been granted. Reference to potential future nutrient removal has been included in the Licence.

“original signed by”

**Larry Strachan, P.Eng.
Director, Environment Act
March 12, 2002**