



Conservation and Water Stewardship

Climate Change and Environmental Protection Division
Environmental Approvals Branch
123 Main Street, Suite 160, Winnipeg Manitoba R3C 1A5
T 204 945-8321 F 204-945-5229
www.gov.mb.ca/conservation/eal

File: 5668.00

November 12, 2013

Dr. Amy Frykoda, MD, CCFP, MSc
Medical Officer of Health
Prairie Mountain Health
P.O. Box 960, 334 -1st St SW
Minnedosa, Manitoba, R0J 1E0

Dear Ms. Frykoda:

Re: PTI Work Camp – Melita Wastewater Holding Tank System - Environment Act Proposal

The responses from the Technical Advisory Committee (TAC) that contained requests for additional information regarding the Environment Act Proposal (EAP) for the PTI Work Camp – Melita Wastewater Holding Tank System were forwarded to the proponent’s consultant. The consultant was asked to address the comments contained in the responses and to provide additional information for the environmental review that is continuing.

Attached you will find the consultant’s November 6, 2013 letter responding to the comments and requests for additional information presented by the TAC. Please review the response to determine if your comments and requests for additional information have been satisfactorily addressed.

Your comments, if any, are required not later than two weeks after the date of this letter. No response on your part will be assumed to indicate no concern.

If you have any questions, please contact me at (204) 945-2614 or by e-mail at Rafiqul.Chowdhury@gov.mb.ca.

Yours truly,
“originally signed by”

Rafiqul Chowdhury, M.Eng., P.Eng
Environmental Engineer

Attachment

- c. Tim Prawdzik, Provincial Manager, Environmental Compliance and Enforcement Branch
Public Registries



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November 12, 2013

Caroline Boissonneault
Assistant Research Biologist
Wildlife Branch
Conservation and Water Stewardship
Box 24, 200 Saulteaux Crescent
Winnipeg, Manitoba R3J 3W3

Dear Ms. Boissonneault:

Re: PTI Work Camp – Melita Wastewater Holding Tank System - Environment Act Proposal

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November 12, 2013

Joy Kennedy
Water Quality Management Section
Water Science and Management Branch
160-123 Main Street, Winnipeg, MB
R3C 1A5

Dear Ms. Kennedy:

Re: PTI Work Camp – Melita Wastewater Holding Tank System - Environment Act Proposal

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FILE NO.: 5668.00

November 12, 2013

Ryan Coulter, M.Sc., P.Eng.
Manager, Environmental Services
Highway Planning & Design Branch
Manitoba Infrastructure and Transportation
1420 - 215 Garry St. Winnipeg, MB R3C 3P3

Dear Mr. Coulter:

Re: PTI Work Camp – Melita Wastewater Holding Tank System - Environment Act Proposal

The responses from the Technical Advisory Committee (TAC) that contained requests for additional information regarding the Environment Act Proposal (EAP) for the PTI Work Camp – Melita Wastewater Holding Tank System were forwarded to the proponent’s consultant. The consultant was asked to address the comments contained in the responses and to provide additional information for the environmental review that is continuing.

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Rafiqul Chowdhury, M.Eng., P.Eng
Environmental Engineer

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- c. Tim Prawdzik, Provincial Manager, Environmental Compliance and Enforcement Branch
Public Registries

November 6, 2013

Manitoba Conservation and Water Stewardship
Environmental Approvals Branch
Brandon, MB
123 Main Street, Suite 160, Winnipeg, MB
R3C 1A5

Attention: Rafiqul Chowdhry

Reference: PTI Work Camp – Melita Wastewater Holding Tank System – Environment Act Proposal – File: 5668.00

Subject: Response to Environment Act Proposal Inquiries

Dear Rafiqul:

As you are aware, PTI Group Inc. retained Burns Maendel Consulting Engineers Ltd. (BMCE) to file an Environmental Act Proposal (EAP) for the proposed wastewater holding tank system at the Melita Lodge; the EAP was submitted on September 9, 2013. Upon review by the Technical Advisory Committee (TAC) we received a letter from Manitoba Conservation and Water Stewardship with comments and requests for additional information on October 24, 2013.

We have prepared the enclosed response to the request for additional information that we received. The comments from the letter received are listed in italics below with our response immediately following.

1. Memorandum from Water Science and Management Branch, Manitoba Conservation and Water Stewardship

- a. *The proposal states that the proposed development is to occur on the W ½ 6-4-26. The Certificates of Title in Appendix A indicate NW 6-4-26.*

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.

- b. *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).*

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.

- c. *The design volume of wastewater is 18,330 US gal/day. The proposal states that daily hauling will have to 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 18,330 US gal/day (15,260 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 14,290 US gal/day (11,900 imgal/day) and we have hauling approved for 17,532 US gal/day (14,600 imgal/day). We have permission for 7,925 US gal/day (6,600 imgal/day) from the Pierson Lagoon and 9,607 US gal/day (8,000 imgal/day) from the Reston Lagoon. Therefore, the design loading of 14,290 US gal/day (11,900 imgal/day) is well under the 17,532 US gal/day (14,600 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.

2. Letter from Prairie Mountain Health, Manitoba Health

It is our opinion that these questions are likely standard questions for a lagoon EAP and are not applicable to the EAP being considered. That said, we provide the following responses to the questions raised by Prairie Mountain Health.

a. Odour control and monitoring

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.

b. Any discharge of effluent is in compliance with Manitoba Environment's guidelines

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 Conservation's guidelines will be carried out throughout the disposal process.

c. Ongoing reporting and appropriate disposal of all hazardous waste

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.

d. Leachate, soil and groundwater monitoring

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.

- e. *Containment design provides the best possible groundwater protection for the area*

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.

- f. *Prevention of pollutant or contaminated wastewaters from entering sewage disposal and municipal ditch systems*

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.

- g. *Fencing, gates and warning signs included to ensure public safety, in case of unsupervised public access to the development*

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.

3. E-mail from Wildlife Branch, Manitoba Conservation and Water Stewardship

The Wildlife Branch of Manitoba Conservation and Water Stewardship stated concerns that native grasses or Great Plains Toads could be impacted by the proposed development. They also noted that they would like to see confirmation that potential wildlife conflicts were studied.

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 below to provide a visualization of the site conditions before and after construction.

Figure 1: Site Condition Prior to Construction on May 1, 2012



This photo was taken standing on Centre Street looking SE across the subject site.

Figure 2: Site Condition as of May 3, 2013



This photo was taken from a similar location as the previous photo. The site has been graded with a construction trailer visible.

4. Letter from Environmental Services Section, Highway Planning and Design Branch

- *The proposed project may require access to PTH3 and/or PHT 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.*

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.

- *A permit may also be required for any construction, above or below ground level, within 38.1 m (125 ft) controlled area or 152.4 m (500ft) controlled circle or for any plantings within 15.2 m (50ft) from the edge of the right of way of PTH3 and PTH 83.*

There is no construction proposed within the control zone setbacks.

- *The proposed project may require a Drainage Study and a Traffic Impact Study to determine if any on highway improvements are required.*

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.

We trust that the enclosed information will satisfy the questions posed by the Technical Advisory. If further information is required, or more elaboration is needed, please don't hesitate to contact us.

Yours truly,
BURNS MAENDEL CONSULTING ENGINEERS LTD.


Daniel A. Burns, P.Eng.
Senior Engineer

6-Nov/2013