

Water and Waste Department • Service des eaux et des déchets

September 1, 2006

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Mr. Mike Van Den Bosch, P.Eng. Environmental Assessment and Licensing Branch Manitoba Conservation Suite 160 – 123 Main Street Winnipeg, Manitoba R3C 1A5

Dear Mr. Van Den Bosch:

RE: JULY 2006 MONITORING REPORTS FOR THE WEST END WATER POLLUTION CONTROL CENTRE LICENCE NO. 2669 E R, THE NORTH END WATER POLLUTION CONTROL CENTRE LICENCE NO. 2684 R R AND THE SOUTH END WATER POLLUTION CONTROL CENTRE LICENCE NO. 2716

Attached please find the July 2006 Monitoring Reports for Licence No. 2669 E R issued for the City of Winnipeg West End Water Pollution Control Centre (WEWPCC), Licence No. 2684 R R issued for the City of Winnipeg North End Water Pollution Control Centre (NEWPCC) and Licence No. 2716 issued for the City of Winnipeg South End Water Pollution Control Centre (SEWPCC). I apologize for the late submission of this report.

Please note the following respecting the report for Licence #2669 E R:

1. On July 6 and 11, there were no results for CBOD5 due to lab error, the former due to quality control failure, the latter due to instrumentation error.

Please note the following respecting the report for Licence #2684 R R:

- 1. On July 6 and 11, there were no results for BOD5 and CBOD5 due to lab error, the former due to quality control failure, the latter due to instrumentation error.
- 2. On July 5, 13 and 25, the BOD5 results were in excess of the limit of 30 mg/L. On both July 13 and 25, raw wastewater flows exceeded 380 ML/d for a good part of the day even though the average daily flow values are recorded as less than 380 ML/d (the averages are higher than normal for both days). During these periods of high flow, some bypassing did occur and TSS, BOD5 and CBOD5 values were found to be higher than normal.

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Please note the following respecting the report for Licence #2716:

- 1. On July 6 and 11, there were no results for BOD5 and CBOD5 due to lab error, the former due to quality control failure, the latter due to instrumentation error.
- 2. On July 20, 21, 23 and 27, there were high total suspended solids results. As was reported in the last monitoring report: "The high TSS value is believed to be due to iron contamination from the sample pipe." This was confirmed to be iron from the pipe that supplies the final effluent sampler. High iron levels from pipe corrosion resulted in high TSS values after the pipe was cleaned and back flushed which was standard protocol for the sampling stations. This protocol has been adjusted and steps are being taken to resolve this problem.
- 3. On July 23, there was no result for pH due to instrument error
- 4. In the May and June monthly compliance reports we noted several occasions where the BOD values were found to be in excess of the licence limit of 30 mg/L. We had noted that we believed part of the problem to be sampler maintenance, which has been corrected. Staff followed up to determine a reason(s) for the non compliance beyond sampler maintenance but found raw wastewater values for those days to be relatively high as well. We could not pinpoint a specific source of the "problem". It should be noted that the BOD values for July are all within the compliance limit. As was noted under Item #2 for the NEWPCC report above, higher but compliant BOD values for July 13 and 25 may reflect the results of wet weather events that impacted on plant operation for less than the full day.

Further to Item #2 for NEWPCC and Item #4 for SEWPCC above, our Director has raised the issue of the licence limits for parameters such as TSS and BOD being a "shall not be exceeded" value with your Director. The above is a good example of this concern in that, while some individual average day values for BOD exceed the limit, the monthly average meets the value. The cost of designing facilities to meet the "shall not exceed" criteria, as you know, is prohibitively expensive.

As you will recall from an earlier discussion and as recorded in the monthly compliance submittal letter dated May 31, 2006, we have been reporting BOD and TSS values for days where average flow values exceed 380 ML/d for NEWPCC and 98.6 ML/d for SEWPCC as "bolded" values. We have also "bracketed" coliform results for such days and have not included the values in the geometric means used for compliance purposes. In the preceding paragraph, we have noted that BOD and TSS values can be impacted significantly even when the daily flows are below the "bypass" values. It should also be noted that the coliform samples are taken as grab samples. In some cases, these grab samples have been taken when the instantaneous flows exceed the values noted above and the plant is in bypass mode. I would like to discuss interpretation of the SEWPCC and NEWPCC licences with you in this regard and compliance reporting of resulting data.

Please let me know of any concerns or questions respecting this submission. I may be reached at the above address, by telephone at 986-4807 or by email at kkjartanson@winnipeg.ca.

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Thanks for your ongoing cooperation and understanding in this matter.

Yours sincerely,

Original signed by:

K.J.T. Kjartanson, P.Eng. Manager of Environmental Standards

KJTK:kk:pr Attachments

c: Cliff Lee, P.Eng., Assistant Director of Red River Region

B.D. MacBride, P.Eng. W.J. Borlase, P.Eng. M.A. Shkolny, P.Eng.