



Friday April 15th 2016

Her Worship Lisa Helps
Mayor of Victoria
mayor@victoria.ca

Dear Madam Mayor:

Thank you for your email message of March 17, 2016, regarding a follow-up on Mr. David Anderson's editorial on sewage. I am pleased to provide you with the following information on the *Wastewater Systems Effluent Regulations* (WSER).

Although the WSER effluent quality standards result in a minimum level of environmental protection through secondary wastewater treatment, jurisdictions can impose more stringent standards to respond to local conditions where needed. Furthermore, while these regulations do not require adoption of tertiary treatment or other types of treatment, they do not preclude or constrain the adoption of more advanced or innovative technology.

The regulatory process for WSER transitional authorization is set out in Schedule 2 of the Regulations. It includes the system of points that allocates the level of risk based on science criteria for effluent quality, quantity and receiving environment considerations. As indicated in subsection 26(2) of the Regulations, if less than 50 points were allocated, the deadline to upgrade is December 31, 2040; if 50 or more points and less than 70 points were allocated, the deadline to upgrade is December 31, 2030; and if 70 points or more were allocated, the deadline to upgrade is December 31, 2020.

Based on data and information submitted to Environment and Climate Change Canada by the CRD in its 2014 transitional authorization applications, the Macaulay Point and Clover Point wastewater systems were allocated 25 points each for the volume of effluent discharged and 5 points each for discharging to open marine waters, which is the minimum number of points for a receiving environment. The Macaulay Point wastewater system was allocated 96 points related to the criteria for the quality of effluent, and the Clover Point wastewater system was allocated 82 points.

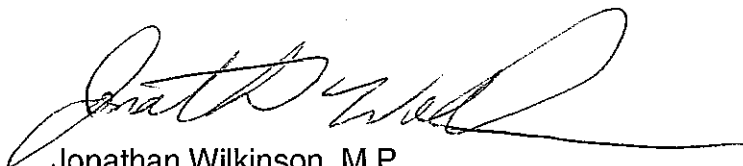
.../2

The criteria for effluent quality are monthly averages for carbonaceous biochemical oxygen demand (CBOD) and concentration of suspended solids during a period of 12 consecutive months. As indicated in the CRD's transitional authorization applications, the average CBOD and average concentration of suspended solids for the Macaulay Point wastewater system were 221.2 mg/L and 256.5 mg/L, respectively from March 2013 to February 2014. For the Clover Point wastewater system, the average CBOD and average concentration of suspended solids were 190.7 mg/L and 219.4 mg/L, respectively for the same time period. The points allocated for these effluent quality criteria are determined using the formula found in Schedule 2 of the Regulations: (average CBOD + average concentration of suspended solids) divided by 5.

The total risk points allocated for the Macaulay Point and the Clover Point wastewater systems were 126 and 112, respectively, which are significantly above the 70 points risk allocation and therefore require a deadline of December 31, 2020.

I trust that this information is helpful. Please accept my best regards.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jonathan Wilkinson', with a long, sweeping underline that extends to the right.

Jonathan Wilkinson, M.P.
Parliamentary Secretary to the Minister of
Environment and Climate Change

c.c.: Murray Rankin, Q.C., Member of Parliament, Victoria