

September 2, 2020

Director, Client Services and Permissions Branch  
Environmental Assessment and Permissions Division  
Ministry of the Environment, Conservation and Parks

Dear Sir:

**Proposed Changes to Environmental Approvals for Municipal Sewage Collection Works  
ERO Number: 019-1080**

---

Region of Niagara staff have reviewed the draft ECA's for the consolidated storm and sanitary sewer systems along with the draft design guidelines that were provided on the ERO site.

Generally the Region is supportive of moving to consolidated linear ECA's for storm and sanitary systems to allow for pre authorized alterations and move low risk projects ahead more quickly, as well as the consolidation of the monitoring requirements into one document, supporting a more consistent set of operating conditions.

As a two tiered system there are concerns on developing agreements with the Local Municipalities on the checking of capacity's in various collection systems and determining ownership of some assets in the existing system that may require some additional time when developing the overall ECA's for the systems.

We have some general comments on the document that are noted below and detailed comments which have been included in the documents attached. We would like to thank you in advance for providing us the opportunity to provide comments and for consideration of the comments provided.

We look forward to continuing to work towards consolidated linear ECA's for the sanitary and storm systems for the Niagara Region.

**Sanitary Linear ECA**

- Complexity of overflow definitions and extra studies required for wet weather flow issues. Can consideration be given for using the definition as adopted by the Wastewater Systems Effluent Regulation (WSER)
- Increased focus on air, noise and vibration impacts requiring studies both during design as well as annually as part of routine operations and maintenance. The requirement to update ESDM and noise screening documents annually for over 100 remote facilities will be a significant task for the Niagara Region and have substantial budgetary impacts.
- Enhanced infrastructure inspection requirements

- Being 2-tiered, it is important that there is an understanding that although the Niagara Region system may include only separated sewers, the local system may still be servicing combined infrastructure.

**Storm Linear ECA**

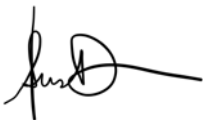
- Looking for clarification on what ditches and culverts are required to be included in the ECA – we have reviewed the Public Transportation and Highway Improvement Act and there was no clarification/definition provided to confirm which ditches and culverts are to be included in the consolidated ECA
- Enhanced infrastructure inspection requirements
- Since any new OGS established with the alteration in condition 5.1 shall be credited a maximum of 50% suspended solids removal in achieving the water quality criteria specified in Appendix A. – please clarify that the intention that these OG will be part of treatment train – was the treatment train intended to be other measures rather than additional OG separators
- Being a 2-tiered system we are wondering how it will be determined where and who will do the overall quality testing and what is expected for the quality standards for the storm sewer system

**Forms required for pre authorized work CS1, SS1, SW1 etc.**

- Would consideration be given under the owner section if the treatment / SPS or SWM facility is under different ownership that a line be add that capacity has been confirmed with the owner as per the attached documentation
- Would consideration be given that an additional section be added after the owner verification for Engineers final verification – this could cover that inspection was completed and testing was completed and met the requirements. Generally forms are signed prior to construction as an approval. The Owner would not be able to sign off on testing and inspection prior to construction.

Once again we would like to thank you in advance for providing us the opportunity to provide comments if there is any questions with regards to the Region's comments we would be happy to discuss them. If you require any clarification please contact the undersigned at your convenience.

Sincerely,



**Susan M. Dunsmore, P. Eng.**  
**Manager, Development Engineering**  
**Planning and Development Services**  
**Phone: (905) 980-6000 or 1-800-263-7215 ext 3661**  
**Address: 1815 Sir Isaac Brock Way, Thorold ON, L2V4T7**