



December 18 2013
Tracey Braun, M.Sc.
Director, Environmental Approvals Branch
Manitoba Conservation
123 Main St. Suite 160
Winnipeg, Manitoba
R3C 1A5

Dear Ms Braun:

**Re: RM of Headingley Wastewater Treatment Facility- License 2869 RR
Request for license alteration.**

I am writing in regards to clause 5 and clause 21 of the Headingley Wastewater Treatment Facility's operating license.

Clause 21 subsections *b* and *c* deals with the effluent limit for fecal and total coliforms. It calls for the monthly geometric mean for fecal and total coliforms to be calculated from "1 grab sample collected at equal intervals on each of a minimum of 3 consecutive days per week". That is 24 samples per month which must be transported to, and analyzed by, a commercial lab. The price for each analysis is \$42.97 which costs the RM of Headingley (for bacteriological analysis only) \$1031.28 per month.

The Headingley Wastewater Treatment Facility was commissioned in June of 2011. After some initial start-up issues were ironed out, we have consistently produced effluent that handily meets the requirements of our license for cBOD, TSS, NH₃-N, TN, TP, and fecal and total coliforms. A perusal of our compliance reports shows, that since January of 2012, the highest monthly geometric mean for fecal and total coliforms was 20 and 119 mpn respectively, well within our limit of 200 and 1500. Most days these results are in single digits.

Our UV system gets regular maintenance, including bulb changes as per the manufacturers specifications. I am confident that there will never be an excursion of our license bacteriological limits.

Due to the substantial cost of bacteriological testing and because of the fact that our record in this regard has been excellent, I feel it is reasonable to request a reduction in the frequency of testing for fecal and total coliforms. If the requirement was reduced to one fecal and one total coliform sample per week the RM could realize substantial savings in analysis and courier costs. The bacteriological requirement would then be the same as nutrients, TSS, and cBOD, resulting in a simpler approach which, in my view, will still meet your monitoring requirements.

In regards to clause 5, which deals with a report on the “re-assessment of the options for treated waste solids and sewage sludge disposal”. I am currently working on a plan for the beneficial reuse of our biosolids and hope to submit a report before the license deadline in June 2014.

As always if you have any questions, feel free to contact the writer.

Regards,

“original signed by”

Colin Allingham
Manager, Headingley WWTF
204-805-1252
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Cc Rafiqul Chowdhury, Environmental Approvals Branch
Sonja Bridges, Environmental Enforcement Branch
Chris Fulsher, RM of Headingley

