



August 13, 2007

Dr. Albert van Roodselaar
Division Manager, Policy and Planning Department
Greater Vancouver Regional District
4330 Kingsway
Burnaby, BC
V5H 4G8

Dear Dr. van Roodselaar,

Re: Environment Canada's Comments on the GVRD's Liquid Waste Management Plan Five-Year Review

This letter provides comments and suggestions from Environment Canada regarding the GVRD's Liquid Waste Management Plan (LWMP) 5-year review. This input is in addition to correspondence from the Burrard Inlet Environmental Action Program / Fraser River Estuary Management Program (BIEAP/FREMP) Management Committee sent to the GVRD on this same subject.

In addition to BIEAP/FREMP Management Committee meetings where the 5-year review was discussed, Environment Canada staff participated in LWMP workshops through the following committees: Environmental Monitoring Committee (EMC), Stormwater Interagency Liaison Group (SILG) and the FREMP Water and Land Use Committee (FREMP WLUC) and BIEAP Plan Implementation Committee (BIEAP PIC).

Given that the District is currently reviewing the LWMP, it seems appropriate to reiterate applicable existing federal requirements related to wastewater management administered by Environment Canada. Currently, all effluents from wastewater systems in Canada must comply with all applicable federal legislation including the *Canadian Environmental Protection Act, 1999* and the *Fisheries Act*.

Environment Canada would like to take this opportunity to recognize the GVRD's active participation as a member of the Environmental Risk Management Model Sub-committee in the on-going development of the Canada-wide Strategy for the Management of Wastewater being led by the Canadian Council of Ministers of the Environment (CCME). A draft CCME Strategy proposing national baseline performance standards equivalent to secondary treatment for effluents from all wastewater systems will be circulated for comment prior to its finalization, expected by March 2008. In addition, Environment Canada intends to develop a federal wastewater effluent regulation under the *Fisheries Act* to implement, at a minimum, the standards and timelines for implementation based on a risk-based



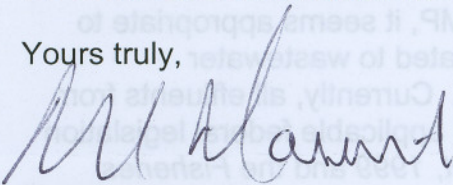
framework from the CCME Strategy. A draft federal wastewater effluent regulation is expected to be circulated for comment in 2008.

Until such time as the CCME Strategy is completed and Environment Canada publishes a federal wastewater effluent regulation, we strongly suggest that the GVRD remain engaged in the CCME process and track the development of the federal wastewater effluent regulations to ensure that the implementation of the LWMP is consistent with any new requirements. As the GVRD embarks on some of the more detailed work related to the upgrade of the two primary wastewater treatment plants, Environment Canada encourages the District to consider an approach that will ensure that the chosen technologies have the capacity to achieve regulatory requirements and protect the receiving environment for future generations. Environment Canada recognizes that the upgrades currently planned for the two primary wastewater treatment plants will be a significant step towards improving the quality of the wastewater being discharged, more closely aligning the District with current and expected federal requirements. Given the benefits of the upgrades, Environment Canada encourages the GVRD to consider advancing their upgrade timelines for both the Iona and Lions Gate wastewater treatment plants, currently planned for 2020 and 2030 respectively.

We would like to thank you for giving Environment Canada the opportunity to participate in your 5-year review process. You may count on our continued collaboration on the committees and working groups. Please find attached comments for your consideration from Environment Canada staff that participated in the various LWMP workshops

Should you have any questions regarding this letter, please feel free to contact me at mike.nassichuk@ec.gc.ca or at 604-666-0064.

Yours truly,



M.D. Nassichuk
A/Pacific and Yukon Director
Environmental Protection Operations

cc.: Rebecca Reid, DFO
Brian Clark, Chair BIEAP/FREMP Management Committee
Michelle Gaudry, Policy Coordinator BIEAP/FREMP
Ed von Euw / Robert Hicks, GVRD
A/Regional Manager, BC MoE, Environmental Protection Regional
Operations, Lower Mainland Region

attach.

Environment Canada's Technical Comments on the GVRD's Liquid Waste Management Plan Five-Year Review (July 2007)

Environment Canada recognizes the significant effort that the GVRD has committed to their wastewater treatment plant receiving environment monitoring programs and the quality of the data that has been collected thus far. The GVRD is also conducting ambient monitoring programs in the Fraser River, Burrard Inlet and the Strait of Georgia. The opportunity to address cumulative effects in existing or new receiving environment monitoring programs to receiving water bodies should be investigated. We therefore support the BIEAP PIC and FREMP WLUC recommendation that environmental monitoring programs and plans related to the LWMP be integrated and coordinated in order to evaluate water quality issues on a regional scale, particularly as they pertain to water quality in the Burrard Inlet and Fraser River estuary.

Environment Canada would like to recommend ambient water quality monitoring of Boundary Bay. The Shared Waters Alliance, of which both EC and the GVRD are members, has been active in efforts to improve water quality in Boundary Bay since 1999. Both EC and BC MoE have undertaken targeted water quality monitoring programs, however a more comprehensive approach to ambient monitoring by the GVRD (as outlined in Commitments C4 and C48 of the LWMP) would lead to a more coordinated and informed approach. The first step could be the collation of existing data.

Environment Canada supports the separation of combined sewer systems, however we would like to see consideration be given to minimizing the impacts of resultant stormwater discharges on receiving waters. A predictive assessment of the quality and quantity of resultant stormwater discharges, and cumulative effects, and in some cases, consideration of treatment options may be appropriate.