

Environmental Protection Branch
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LWMP PROJECT TEAM
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MAY 29 2000

Mr. Ken Cameron
Manager, Policy & Planning Department
Greater Vancouver Regional District
4330 Kingsway
Burnaby, BC V5H 4G8

Dear Mr. Cameron:

Re: GVRD Liquid Waste Management Plan

I thought it would be useful to reiterate in writing the five conditions that DOE and DFO attached to their support for the GVRD's approach to liquid waste management and the GVRD's plan for monitoring the effects of discharges from their waste water treatment plants. These are the five conditions that were discussed at the March 9 meeting of the parties at the Fairmont Vancouver Airport Hotel.

I must emphasize that compliance with the *Fisheries Act* (S.36(3)) is based on "deposits". Neither DOE nor DFO can condone or ignore "end of pipe" violations of the *Fisheries Act*. It is therefore important that these conditions not be construed in any way as condoning *Fisheries Act* violations.

The conditions are as follows:

- 1) That the GVRD demonstrate, as soon as possible and to the satisfaction of DOE and DFO, that a receiving-environment approach to liquid waste management is both feasible and defensible with respect to the *Fisheries Act*. This demonstration, which should include data from the Lion's Gate and/or Iona receiving environments, will outline the experimental design required to demonstrate statistically significant trends for at least a couple of key parameters at levels below those expected to cause significant impacts in the receiving environment. It will also show how the "risk assessment" and "constructive action" steps would be built into the monitor/trigger/act continuum - it is important that this matter not be left to scientific debate on cause and significance, resulting in possible inaction even though a trigger has been activated. The monitor/trigger/act concept is the GVRD's proposal and it is therefore up to you to demonstrate to DOE and DFO that it is feasible, defensible, and compatible with the *Fisheries Act*.

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- 2) If the GVRD can demonstrate to the satisfaction of DOE and DFO that a receiving-environment approach to liquid waste management is feasible, defensible, and compatible with the *Fisheries Act*, then DOE and DFO will look seriously at working with the GVRD to assess the effectiveness of this approach (with a particular focus on the receiving environments of the Lion's Gate and Iona Sewage Treatment Plants). The details of the assessment, including its duration, would be defined in an addendum to the BIEAP/FREMP MOU which would include provisions for any party to terminate its support for the assessment early, as well as for the parties to extend the assessment beyond it's prescribed deadline.
- 3) That the GVRD commit, on an ongoing basis, to run monthly 96-hr. bioassays on full strength effluent at each of its five sewage treatment plants, and report the results, as soon as available, to DOE, DFO, and MELP.
- 4) That the GVRD commit to determine the cause of residual effluent toxicity at each of its five sewage treatment plants and report the results, including plans and schedules to reduce the toxicity, to DOE, DFO, and MELP by March 31, 2001.
- 5) That the GVRD act to improve the treatment systems at the Lion's Gate and Iona sewage treatment plants with the objective of substantially reducing the frequency of failure of the monthly 96-hr. acute bioassay tests on full-strength effluent.

It is readily acknowledged that these conditions will involve costs to the GVRD. Such costs, however, are relatively minor in comparison those that would be incurred if the GVRD was to embark immediately, for example, on a further program of major capital initiatives such as secondary treatment at Lion's Gate and Iona and ammonia reduction at Annacis and Lulu.

Yours truly,



J. Brian Wilson
Director, EP

cc: Jim McCracken, MELP
Mike Henderson, DFO