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Greg Clark Chapter

August 24, 2022

Mr. Aziz S. Ahmed, P.Eng. Manager  
Municipal Water and Wastewater Permissions  
Ministry of the Environment, Conservation and Parks  
40 St. Clair Ave. West, 2<sup>nd</sup> Floor,  
Toronto, ON M4V 1M2

By email to: [Aziz.Ahmed@Ontario.ca](mailto:Aziz.Ahmed@Ontario.ca)

Re: ECA Number 7877-CALRZU Issued May 3, 2022  
Erin Water Resource Recovery Facility

Dear Mr. Ahmed:

The Coalition for the West Credit River (Coalition) remains very concerned with the potential environmental impact of the Erin Water Resource Recovery Facility (WRRF) and, in particular, the temperature of its treated effluent harming the sensitive coldwater Brook Trout habitat of the West Credit River.

As your Ministry is aware, the approved sewage treatment plant proposes to discharge large flows of sewage effluent into the relatively small flow of the West Credit River. The lack of significant dilution will greatly magnify the thermal impact of warm effluent on this coldwater stream.

The Coalition expressed concerns about the thermal impact of the Erin WRRF to the Ministry of Environment Conservation and Parks (MECP) during the Environmental Compliance Approval (ECA) development process. We shared data showing the summer of 2021 effluent temperature from 5 southern Ontario wastewater treatment plants exceeded the 19°C temperature assumed in the Environmental Study Report (ESR). We have made known to you and your staff of our concerns that the ESR underestimated the thermal impact of the plant. These concerns were shared by Environment and Climate Change Canada (ECCC) in comments provided during their assessment of our Designation Request under the Impact Assessment Act.:

*“ECCC recommends that a focussed follow-up thermal risk study be considered to verify the predictions of the models to ensure that Brook Trout and other important species are protected.”<sup>i</sup>*

The ECA requires the Town of Erin to design and install an effluent cooling system. We fully support the inclusion of the effluent cooling system; it and other essential mitigation measures will be critical to preventing thermal impacts to this sensitive coldwater Brook Trout population.

The ECA was issued in early May of this year. Clause 3.2 on page 12 of the ECA indicates the final design documents for the effluent cooling system must be submitted (assumedly in the near future), and once received and approved, MECP would issue an Addendum to the ECA for the effluent cooling system.

Please advise whether the design of the effluent cooling system has been received by your office. If not, do you have a timetable from the Town of Erin or their engineering consultant of when it will be submitted?

Once received, we would very much appreciate receiving a copy of the design drawings and design report, as we would like to engage third-party experts to review the design. We feel this is reasonable, as we are unaware of any other wastewater effluent cooling systems installed in the province, and it will be the last line of defence in ensuring that effluent has no thermal impacts on Brook Trout.

We remain concerned that the effluent cooling system could prove to be undersized or prone to breakdown, given that this is a new application of existing industrial equipment in a sewage treatment plant. A third-party review would add another layer of safety to ensure that coldwater Brook Trout habitat of the West Credit River will be protected over the long term.

We look forward to your response.

Respectfully,



Judy Mabee  
President, Belfountain Community Organization  
Chair, Coalition for the West Credit River  
(416) 670-3879

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<sup>1</sup> From Robert Clavering, Senior Environmental Assessment Officer, Environment and Climate Change Canada – Additional Information for the Designation Request of the Erin Wastewater Treatment Plant Project in response to Christine Greenway's, questions – May .