City of Richmond

Report to Committee

to Public Works & Transportation – Nov. 19, 20

To:	Public Works and Transportation Committee	**Date:**	November 5, 2003
From:	Siu Tse, M.Eng., P.Eng. Manager, Engineering Planning	**File:**	~~0155-01~~ 0400-01
Re:	**Municipal Wastewater Management – Implications of Listing of Ammonia under the Canadian Environmental Assessment Act (CEPA)**		

Staff Recommendation

That, as per the attached report dated November 5, 2003,

1. Letters be written to Honourable Joyce Murray, Minister of Water, Land and Air Protection and to the Honourable David Anderson, Minister of Environment advising of Council's position that the management of environmental issues pertaining to municipal wastewater be conducted using a "one window" regulatory approach and in a manner which considers site-specific conditions to ensure wise use of financial resources and meaningful environmental benefits.

2. That copies of these letters be sent to the Greater Vancouver Regional District (GVRD), the Union of BC Municipalities and the Federation of Municipalities.

for Siu Tse, M.Eng., P.Eng.
Manager, Engineering Planning
(4075)

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ROUTED TO:	CONCURRENCE	CONCURRENCE OF GENERAL MANAGER

1089043

Staff Report

Origin

Chlorinated municipal wastewater and ammonia dissolved in water were recently added to the Toxic Substances list under the Canadian Environmental Protection Act (CEPA). In accordance with CEPA, this listing means that Environment Canada must develop regulations or other instruments for preventing and/or controlling listed substances. The Greater Vancouver Regional District (GVRD) has expressed concern regarding Environment Canada's proposed approach for addressing ammonia. The GVRD have requested that Richmond Council support their position that federal and provincial management of municipal wastewater be harmonized and that strategies for managing ammonia in municipal wastewater be developed with full consideration of site-specific conditions (see Attachment 1). Council has also be asked to communicate their support of these positions to Honourable Joyce Murray, Minister of Water, Land and Air Protection and to the Honourable David Anderson, Minister of Environment.

To encourage efficient management and ensure that the environment is protected in a way that is most meaningful, this report recommends that Council support the management principles of federal/provincial management harmonization and the use of site-specific considerations in developing strategies for addressing environmental impacts.

Background

Environment Canada Proposed Approach

The listing of chlorinated municipal wastewater will not have implications for sewage managed by the GVRD as the sewage is de-chlorinated prior to discharge. Environment Canada has recently published a proposed notice requiring municipalities to prepare pollution prevention for addressing ammonia in municipal wastewater effluents. It is indicated that the plan would be prepared to "reduce to the fullest extent the amount of ammonia in the effluent". It is understood from the GVRD that a final notice will be published by Environment Canada by December 2004.

GVRD Concerns

The GVRD has expressed concern that:

1. Because the environmental impacts of municipal wastewater, including that due to ammonia, are already being regulated in accordance with the Provincial Waste Management Act, Environment Canada should be seeking to harmonize their requirements with existing provincial regulations.

2. The benchmark of "to the fullest extent possible" is an arbitrary objective that does not consider actual impacts based on local conditions. Accordingly, money spent on ammonia reduction upgrades may not result in meaningful environmental benefits that could be achieved if investments were directed in other areas. The GVRD advise that ammonia reduction upgrades to reduce ammonia "to the fullest extent" in the discharges from Annacis and Lulu treatment plants would require a capital investment in the order of $110 million.

Evaluation of GVRD Concerns

Staff agree with GVRD's concerns based on the following consideration:

1. Efficient environmental management depends upon the alignment and harmonization of the various regulatory systems.

   To avoid duplication and potential conflicting direction, governmental management programs need to be brought together and offered under a "one-window approach".

2. The impacts of ammonia vary significantly depending upon site-specific conditions and do not pose significant impacts in all receiving environments.

   Ammonia is a nutrient and forms part of the natural nitrogen cycle. However, there are two main forms of ammonia, one of which is quite toxic. The form that ammonia takes in water is largely dependent upon pH and temperature and is generally much more of concern in freshwater systems. Effective environmental protection depends upon the allocation of fiscal resources to areas, which result in meaningful environmental benefit. To ensure that this is the case with ammonia discharges, effective pollution strategies should be based upon managing effects in consideration of actual conditions of the receiving environments.

Staff recommends that Council support the GVRD's position that a "one-window" approach be used and that site-specific conditions be considered in developing regulatory requirements under CEPA and that letters be sent to Minister of Environment and the Minster of Water, Land and Air Protection. Proposed draft letters are included in Attachments 2 and 3.

Financial Impact

There is no financial impact associated with this report.

Conclusion

Environment Canada is currently developing federal regulatory requirements for managing ammonia and chlorinated wastewater effluents in accordance with the Canadian Environmental Protection Act (CEPA). Their proposed strategy for addressing ammonia may mean that significant fiscal resources will need to be invested in changing Lulu and Annacis treatment plants to reduce ammonia levels in the effluent discharge with little environmental benefit. In addition, the current proposed approach by Environment Canada has not been harmonized with already existing provincial regulations. This report recommends that the City express these concerns to the federal Minister of Environment and the provincial Minster of Water, Land and Air Protection and encourage the use of an alternative approach – one which offers a "one-window" harmonized provincial and federal regulatory approach and which takes into consideration site-specific information in the setting reduction standards.

Margot Daykin

Margot Daykin, M.R.M
Assistant Manager - Environmental Programs (local 4130)

Attachment 1: Letter Received From the Greater Vancouver Regional District

Greater Vancouver Regional District
4330 Kingsway, Burnaby, British Columbia, Canada V5H 4G8

Office of the Chairperson
Telephone (604) 432-6215
Fax (604) 432-6248

Oct 7/03 - copied to MAYOR/ Suzanne for action

September 30, 2003

City of Richmond
RECEIVED
OCT - 3 2003
MAYOR'S OFFICE

File: CP08 02 A902

10/06/03
To Cl.
(To) GM Community Safety

Mayor Malcolm Brodie
City of Richmond
6911 No 3 Road
Richmond, BC V6Y 2C1

Dear Mayor Brodie and Council Members:

RE: Environment Canada's Proposed Notice regarding Preparation of Pollution Prevention Plans for Ammonia Dissolved in Water, Inorganic Chloramines and Chlorinated Wastewater Effluents

The GVRD is seeking your support in advising the provincial Minister of Water, Land and Air Protection and the federal Minister of Environment of the municipal concerns regarding a proposed notice that was published by Environment Canada in the *Canada Gazette* in June, 2003.

The attached report (Attachment 2) and resolution, considered and adopted by the GVRD Board of Directors at its July 25, 2003 meeting, provides the background on this issue and summarizes the local government concerns. Part 4 of the resolution states:

> *Forward a copy of this report to all Councils of member municipalities, the Union of B.C. Municipalities, the Federation of Canadian Municipalities, the Canadian Water and Wastewater Association (CWWA) and local MPs and MLAs requesting support in making the municipal concerns known to the federal and provincial ministers.*

Letters from your municipality to the Honourable Joyce Murray, Minster of Water, Land and Air Protection and the Honourable David Anderson, Minister of Environment will assist in making the ministers aware of the local government concerns. Our August 6, 2003 letter (Attachment 1) to the Honourable Joyce Murray is provided for your guidance and briefly describes the two key local government concerns:

1) The desire for a "one-window" approach for Canadian municipalities, and
2) The consideration of the site specific nature of ammonia dissolved in water

Your assistance in raising awareness of this issue to the ministers is appreciated.

Yours truly,

J. Marvin Hunt
Chair, Board of Directors

MH/FN:dt

Attachments:

1) August 6, 2003 letter to the Honourable Joyce Murray
2) Report considered at the July 25, 2003 meeting of the Board of Directors titled Environment Canada's June 7, 2003 Proposed Notice Regarding CEPA Toxic Substances

cc: Richard Taylor, Union of B.C. Municipalities
James Knight, Federation of Canadian Municipalities
Duncan Ellison, Canadian Water and Wastewater Association

Greater Vancouver Regional District
4330 Kingsway, Burnaby, British Columbia, Canada V5H 4G8

Office of the Chairperson
Telephone (604) 432-6215
Fax (604) 432-6248

August 6, 2003

The Honourable Joyce Murray
Minister of Water, Land and Air Protection
President, CCME Council of Ministers
Parliament Buildings
Victoria, B.C., V8V 1X4

File: CP08 02 A902

Dear Minister Murray:

RE: Environment Canada's Proposed Notice regarding Preparation of Pollution Prevention Plans for Ammonia Dissolved in Water, Inorganic Chloramines and Chlorinated Wastewater Effluents

Thank you for taking the time to meet with me and GVRD staff on July 23rd regarding Environment Canada's proposed notice on the subject substances that was recently published in the *Canada Gazette*. At the July 25, 2003 meeting of the Board of Directors the following motion was adopted:

That, specific to the proposed notice published by Environment Canada in the Canada Gazette on June 7, 2003 requiring the preparation of pollution prevention plans for ammonia, inorganic chloramines and chlorinated wastewater effluents, the GVS&DD Board:

1) *Authorize the Board Chair to further advise the federal Minister of Environment and the provincial ministers through the Canadian Council of Ministers of the Environment (CCME) on the municipal concerns about the proposed notice.*

2) *Authorize the Board Chair to prepare and present a resolution to the Federation of Canadian Municipalities on the municipal concerns about the proposed notice.*

3) *Direct staff to respond to the proposed notice within the 60 day comment period regarding the municipal concerns and any specific technical comments.*

4) *Forward a copy of this report to all Councils of member municipalities, the Union of B.C. Municipalities, the Federation of Canadian Municipalities, the Canadian Water and Wastewater Association (CWWA) and local MPs and MLAs requesting support in making the municipal concerns known to the federal and provincial ministers.*

As discussed at our meeting the key municipal concerns regarding the proposed pollution prevention plan approach to the management of these substances are:

1) The desire for a "one-window" approach for Canadian municipalities

The substances do not lend themselves to the traditional source control approach associated with pollution prevention planning. The ammonia source is primarily from human waste and chlorine is used at treatment plants to protect receiving water beneficial use. These substances are already regulated by the provinces and it is recommended that the federal government work with the provinces to utilize the existing provincial instruments pursuant to any new requirements of the Canadian Environmental Protection Act (CEPA). A "one-window" approach for regulation from the provincial and federal governments is important for municipalities to avoid duplication or regulatory conflicts regarding the management of these substances.

2) The site specific nature of ammonia dissolved in water must be considered

Ammonia removal is costly and the risk associated with toxic levels of ammonia is very site specific. That was the finding of Environment Canada's risk assessment, documented in the report titled *Priority Substance List Assessment Report – Ammonia in the Aquatic Environment*, which states in section 3.4 that "*since the toxicity of ammonia is dependent on many site-specific variables, options to reduce exposure to ammonia from municipal wastewater systems should be examined on a site-specific basis. If a city or region has a water body with a large dilution capacity, then ammonia control may not be necessary, or perhaps an improved dilution system may be required*". These findings are not being reflected in the current Proposed Notice that includes, in part 4 (3) (b) (i), an expectation to "reduce to the fullest extent the amount of ammonia in the effluent...".
Municipalities want the option to be able to demonstrate to the provincial and federal regulators that ammonia levels do not pose a toxic risk in the local, site specific receiving environment.

I was pleased that you are going to bring this important matter forward at the national level in your capacity as President of the CCME Council of Ministers. As suggested by Minster Anderson in his letter of June 12, 2003 we are hopeful that through the Canadian Council of Ministers of the Environment (CCME) an effective forum can be created to work cooperatively on this issue. Municipalities understand the need to manage these substances and seek the most effective means to accomplish what is needed to protect the environment.

Yours truly,

Vice-Chair

J. Marvin Hunt
Chair, Board of Directors

FN/ak

Policy and Planning Department
Greater Vancouver Regional District *Telephone (604) 432-6375*
4330 Kingsway, Burnaby, British Columbia, Canada V5H 4G8 *Fax (604) 436-6970*

Committee Meeting Date: July 16, 2003

To: Sewerage and Drainage Committee

From: Fred Nenninger, LWMP Program Manager
Policy and Planning Department

Date: June 19, 2003

Re: **Environment Canada's June 7, 2003 Proposed Notice Regarding CEPA Toxic Substances**

Recommendation:
That, specific to the proposed notice published by Environment Canada in the Canada Gazette on June 7, 2003 requiring the preparation of pollution prevention plans for ammonia, inorganic chloramines and chlorinated wastewater effluents, the GVS&DD Board:

1) Authorize the Board Chair to further advise the federal Minister of Environment and the provincial ministers through the Canadian Council of Ministers of the Environment (CCME) on the municipal concerns about the proposed notice.

2) Authorize the Board Chair to prepare and present a resolution to the Federation of Canadian Municipalities on the municipal concerns about the proposed notice.

3) Direct staff to respond to the proposed notice within the 60 day comment period regarding the municipal concerns and any specific technical comments.

4) Forward a copy of this report to all Councils of member municipalities, the Union of B.C. Municipalities, the Federation of Canadian Municipalities, the Canadian Water and Wastewater Association (CWWA) and local MPs and MLAs requesting support in making the municipal concerns known to the federal and provincial ministers.

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1. PURPOSE

To respond to Environment Canada's proposed notice regarding the preparation of pollution prevention plans for ammonia, inorganic chloramines and chlorinated wastewater effluents. The notice was published in the Canada Gazette on June 7, 2003 and a 60 day period has been allowed for the submission of comments. The proposed notice has the potential to lead to an

management instrument. Although it has been suggested that they use management agreements with the provinces or a code of practice similar to the code developed for the management of road salts they have not chosen these options.

Content of the Proposed Notice

The proposed notice published on June 7, 2003 (Attachment 4) requires municipalities to prepare and implement a pollution prevention plan pursuant to the CEPA Act and the requirements of the proposed notice.

There are specific trigger levels identified for wastewater collection and treatment systems and if they apply a pollution prevention plan must be prepared. Municipalities are to determine the appropriate content of their own plan but the plan must meet all the requirements of what will be the final notice. The plan must consider seven factors, the most significant of which appear to be:

- The elements of Environment Canada's long-term strategy for these substances, which includes treatment systems equivalent in performance to secondary treatment, future CEPA instruments and a regulation under the Fisheries Act

- The risk management objectives that define what the Minister expects persons to achieve, which for ammonia states "reduce to the fullest extent the amount of ammonia in the effluent...".

- Source control initiatives targeting not only ammonia, but also nonyphenol, textile mill effluent, mercury, lead, chromium, cadmium, and arsenic compounds.

- Implementing a monitoring program in the receiving environment in relation to water quality guidelines for reactive chlorine (0.0005 mg/L) and un-ionized ammonia (0.019 mg/L).

Plans must be prepared and implementation started within 24 months and the plan must be implemented within 60 months. Written declaration must be provided that a plan has been prepared. This includes:

- Providing base-line information on the level of treatment that exists and the concentration of substances in the effluent before the plan is implemented.

- Identifying specific actions that will be undertaken and their anticipated results on effluent concentrations.

- A description of how the plan meets the applicable risk management objectives (which for ammonia is to "reduce to the fullest extent the amount of ammonia in the effluent...")

Municipal Concerns

The proposed notice has not adequately addressed the three key municipal concerns that were previously identified.

The need to harmonize federal and provincial management strategies and provide a "one window approach" for municipalities.

Having to meet regulatory requirements for the same substances for both senior levels of government creates duplication, considerably more administrative work for municipalities and leads to further ambiguity regarding the real needs to ensure protection of the receiving environment. The pollution prevention plan requirement as defined by the proposed notice appears to be a very complex way to manage substances that have very little opportunity to be managed in the traditional pollution prevention planning sense. The major source of ammonia in municipal wastewater is human waste and there are limited source control options available. Chlorine is used to protect the water uses in the receiving environment and the requirement for declorination should be readily accommodated through provincial permits, which address the use of chlorine at treatment plants.

> *It is again recommended that the federal government work with the provinces to put in place an alternative instrument, such as provincial / federal management agreements pursuant to CEPA, to address these substances and not use the pollution prevention planning provision for municipalities as presented in the proposed notice.*

Concern about setting arbitrary objectives that do not consider local conditions, mixing zones, and the assimilative capacity of the receiving environment.

The proposed notice makes some attempt to account for site conditions that would be low risk relative to toxic levels of ammonia. This is provided by conditions that must be met to trigger the application of the proposed notice for a wastewater collection or treatment system. Once triggered it becomes less clear, from an environmental or legal perspective, on how the preparation of a pollution prevention plan should proceed. Does the requirement to consider the risk management objective expected by the Minister to "reduce to the fullest extent the amount of ammonia in the effluent..." dominate all other considerations or should the consideration of a monitoring program to meet the water quality objectives to protect the receiving environment be the key consideration with ammonia reductions provided as necessary?

> *It is recommended that through management agreements between the senior governments the opportunity be provided for municipalities to demonstrate the extent of reduction of ammonia required to protect the local receiving water. This opportunity should also be included when Environment Canada develops its long-term strategy for these, and other, substances.*

4) Environment Canada's June 7, 2003 Canada Gazette Proposed Notice requiring the preparation and implementation of pollution prevention plans for ammonia dissolved in water, inorganic chloramines and chlorinated wastewater effluents.

Environment Canada have now distributed a summary report of their consultation session. The three major common concerns voiced by municipalities across Canada include:

1) The need to harmonize the proposed federal approach with existing provincial regulations for municipal wastewater effluents. Municipalities are regulated by the provinces and prefer a "one-window approach" to wastewater management.

2) Concern about setting risk management objectives based on arbitrary or artificial numbers that are end-of-pipe based and that do not consider important factors such as local conditions, mixing zones and the assimilative capacity of the receiving environment.

3) The potentially high cost to build ammonia reduction facilities if there are no environmental benefits to be gained and that finds may need to be diverted from more important environmental priorities.

3. ALTERNATIVES

1) Be proactive and further inform the provincial and federal agencies about municipal concerns.

   Staff have provided comments on the proposed approach through the official consultation process. Given the comments of other Canadian municipalities it would be appropriate to further inform provincial and federal agencies, through the office of the GVS&DD Board Chair, about municipal concerns. To ensure municipal concerns are made known to the ministers it is imperative that meetings with the provincial Minister of Water, Land and Air Protection, Joyce Murray, and the federal Minister of Environment Canada, David Anderson, be arranged through the office of the GVRD Board Chair. Having the issues understood at the most senior level is important given the precedent setting nature of these first management plans under the federal legislation that deal with municipal wastewater management.

2) Wait until Environment Canada publishes their proposed management plan in the Canada Gazette (by June 2003).

   The formal comment period following publication in the Gazette is a short 60 days. This may not be enough time to ensure municipal concerns are heard and understood by the relevant ministers and officials.

4. CONCLUSION

Environment Canada held consultation sessions last fall across Canada on their proposed management plans for ammonia and chlorinated municipal effluents. They have published a summary of their consultation sessions. Given the District's concerns and comments and those of other municipalities across the country it is recommended a proactive approach be taken to inform the provincial and federal ministers and officials about municipal concerns.

March 17, 2003 File: CP08 02 A902

The Honourable David Anderson
Minister of the Environment
Les Terrasses de la Chaudiere
10 Wellington St., 28th Floor
Hull, Quebec, K1A 0H3

Dear Minister Anderson:

RE: Municipal Wastewater Effluents and Proposed Management Plans for CEPA Toxic Substances

At its February 2003 meeting the Greater Vancouver Sewerage and Drainage District (GVS&DD) Board adopted the following resolution:

> *That the GVS&DD Board authorize the Board Chair to meet with the federal Minister of Environment Canada and the provincial Minister of Water, Land and Air Protection to convey the position of the District regarding municipal concerns about proposed management plans for substances listed under the federal Canadian Environmental Protection Act (CEPA 1999).*

This resolution was brought forward to the Board in response to the public consultation that was undertaken by Environment Canada last fall regarding the proposed risk management strategy addressing ammonia, inorganic chloramines and chlorinated wastewater effluents under CEPA.

District staff actively participated in the consultation process and provided written comments outlining our concerns. Environment Canada published the results of their consultation sessions, held across Canada last year between August and November, and it confirmed for us that there are at least three important and common municipal concerns:

1) The need to harmonize the proposed federal approach with existing provincial regulations for municipal wastewater effluents. Municipalities are regulated by the provinces and prefer a "one-window" approach to wastewater management when dealing with senior regulatory agencies.

2) Concern about setting risk management objectives based on arbitrary or artificial numbers that are end-of-pipe based and that do not consider important factors such as local conditions, mixing zones, and the assimilative capacity of the receiving environment.

March 17, 2003 File: CP08 02 A902

The Honourable Joyce Murray
Minister of Water, Land and Air Protection
Parliament Buildings
Victoria, B.C., V8V 1X4

Dear Minister Murray:

RE: Municipal Wastewater Effluents and Proposed Management Plans for CEPA Toxic Substances

Please find attached a copy of our letter to the Honourable David Anderson, Minister of the Environment, regarding the proposed risk management strategy addressing ammonia, inorganic chloramines and chlorinated wastewater effluents. The letter includes a recent resolution of the Greater Vancouver Sewerage and Drainage District (GVS&DD) Board authorizing the Board Chair to meet with the federal and provincial ministers on this issue.

Although this is a federal government initiative we are writing to make you aware of our concerns. To be efficient and effective, there is a real need to harmonize the federal and provincial approaches to the management of municipal wastewater. We believe the Province plays a key role in this regard and want to gain a better understanding of your ministry's position relative to the proposed federal risk management strategies for these substances. In accordance with the Board's resolution, we request a meeting to further advise you of the local government concerns and to gain a better understanding about the provincial / federal agreements and arrangements regarding municipal wastewater management.

Our advice to Environment Canada continues to be that the best management plans should be developed with full consideration for local receiving environment risks and the multi-jurisdictional regulatory and administrative framework that exists between provincial and municipal governments with regard to municipal wastewater management.

Yours truly,

J. Marvin Hunt
Chair, Board of Directors

Attachment 2: Proposed Letter to Minister David Anderson

The Honourable David Anderson
Minister of Environment
Les Terrasses de la Chaudiere
10 Wellington St., 28th Floor
Hull, Quebec, K1A 0H3

Dear Minister Anderson:

Re: Environment Canada's Proposed Notice regarding Preparation of Pollution Prevention Plans for Ammonia Dissolved in Water, Inorganic Chloramines and Chlorinated Wastewater Effluents

The City of Richmond shares the concerns expressed by the Greater Vancouver Regional District (GVRD) in their letter to you dated March 17, 2003, regarding Environment Canada's proposed notice on the subject substances that was published in the Canada Gazette last summer.

Richmond is concerned that the new regulations being proposed by Environment Canada have not been harmonized with existing provincial regulations and may result in duplication, confusion and/or other governmental inefficiencies.

The City of Richmond is also very concerned that proposed reduction standards for ammonia do not consider site-specific conditions. As a result, we are concerned that significant financial resources will be spent to achieve a federal regulatory requirement, which may not result in meaningful benefits for our specific environment.

To this end, the City of Richmond requests that your Ministry review its proposed approach and that it specifically works in collaboration with the BC Provincial Government and the Greater Vancouver Regional District (GVRD) to develop a "one-window" approach for managing environmental issues pertaining to municipal wastewater discharges and that that site-specific conditions are considered in establishing regulatory standards. A copy of our letter to the Honourable Joyce Murray, Minister of Water, Land and Air Protection is enclosed for your information.

Richmond respects the importance of the environment and the need to protect the environment from toxic substances. We also respect the need to use fiscal resources wisely and ensure that investments made to protect the environment are made in areas which achieve meaningful environmental benefits.

Your assistance in this addressing our concerns is appreciated.

Yours truly,

Malcolm D. Brodie
Mayor

cc: The Honourable Joyce Murray, Minister of Water, Land and Air Protection
J. Marvin Hunt, Chair, Board of Directors, Greater Vancouver Regional District
Richard Taylor, Union of B.C. Municipalities
James Knight, Federation of Canadian Municipalities

Attachment 3: Proposed Letter to Minister Joyce Murray

The Honourable Joyce Murray
Minister of Water, Land and Air Protection
President, CCME Council of Ministers
Parliament Buildings
Victoria, BC, V8V 1X4

Dear Minister Murray:

Re: Environment Canada's Proposed Notice regarding Preparation of Pollution Prevention Plans for Ammonia Dissolved in Water, Inorganic Chloramines and Chlorinated Wastewater Effluents

The City of Richmond shares the concerns expressed by the Greater Vancouver Regional District (GVRD) in their letter to you dated August 6, 2003, regarding Environment Canada's proposed notice on the subject substances that was published in the Canada Gazette last summer. A copy of our letter to Environment Canada is enclosed for your information.

Richmond is concerned that the new regulations being proposed by Environment Canada have not been harmonized with existing provincial regulations and as result, may duplicate or contradict existing Provincial regulations. We are also very concerned that the lack of consideration for site-specific conditions in establishing reduction standards which may result in the expenditure of significant fiscal resources without meaningful environmental benefit.

To this end, the City of Richmond requests that your Ministry work in collaboration with Environment Canada and the Greater Vancouver Regional District (GVRD) to develop a "one-window" approach for managing environmental issues pertaining to municipal wastewater discharges and to ensure that site-specific conditions are considered in developing effective regulatory requirements.

Richmond respects the importance of the environment and the need to protect the environment from toxic substances. We also respect the need to use fiscal resources wisely and ensure that investments made to protect the environment are made in areas where meaningful environmental benefits are achieved.

Your assistance in this addressing these concerns is appreciated.

Yours truly,

Malcolm D. Brodie
Mayor

cc: The Honourable David Anderson, Minister of Environment
J. Marvin Hunt, Chair, Board of Directors, Greater Vancouver Regional District
Richard Taylor, Union of B.C. Municipalities
James Knight, Federation of Canadian Municipalities