

The Canadian Water and Wastewater Association (CWWA) is the national voice of the water and wastewater sector. The Association's primary role is to monitor federal legislation and national policies for relevance and impact on the municipal water and wastewater sector and advocate on its behalf.

CWWA, as a member of NPRI's Multi-Stakeholder Work Group has reviewed the proposed changes to how facilities report releases of pollutants to water. The Association and our members have several concerns with the proposed changes.

The first general change will be to develop an effluent volume-reporting threshold for releases to water. We note that the municipal wastewater sector already has an effluent threshold of 10,000 m³/day to determine reporting under the NPRI. This is working well for our sector, and we support the concept of expanding this requirement to other reporting sectors. We also note that the current reporting threshold is adequately capturing wastewater facilities, and if a lower threshold is proposed, we recommend that wastewater facilities should be exempt (ie: remain at the current reporting threshold).

The other general change is that Biochemical Oxygen Demand (BOD), Chemical Oxygen Demand (COD) and Total Suspended Solids (TSS) be added to the NPRI. Wastewater systems already report BOD and TSS to the federal government under the Wastewater Systems Effluent Regulation (WSER). Unless there is coordinated effort to harmonize reporting under other federal and provincial requirements this would create duplicate reporting and increase the already substantial administrative burden of preparing NPRI reports.

The impact of TSS, BOD and COD levels are highly dependent on the receiving body and other environmental factors. An end of pipe measurement of these parameters will offer little insight into the health of Canadian water bodies or pollutant levels.

We note that in the case of COD there is no evidence of COD monitoring under the national monitoring program for surface water based on 2016 data for Ontario. The users of the NPRI data would not have any information to compare to and that would be confusing. Furthermore, the Hach Company notes that BOD most closely models the aquatic ecosystem vs COD. Therefore, it begs the question, what is that we want to accomplish with COD in WWTPs? In contrast, in Pulp & Paper, Oil & Gas and Mining, COD is and should be used as the default waste parameter, for valid reasons: the effluent is toxic, thus adversely affecting the BOD result, or there are recalcitrant chemicals, (those that are not easily consumed by bacteria inside the 5-day limit.) toxicity can result from heavy metals in the discharge, or toxins like cyanides. For those reasons, COD reporting is fine—for those industries.

Total suspended solids loadings are very site specific to be able to determine if there should be any concern. Also erosion is a natural process not only in the mountains but in lower slopes such

as in Southern Ontario. Natural erosion levels are much more significant than discharges from WWTPs.

The 25 mg/L TSS limit as well as the 25 mg/L BOD limit, approved by CCME in WSER were established based on those limits providing mitigation for the problems that EECC is now citing as the rationale for reporting. In other words, there's no education that WWTPs prevent the problem. Then, by reporting that tonnes of material were discharge are most likely to lead to the perception in the public's eye that we are causing the problem that we've mitigated.

In discussing the rationale, the document reads: "If a facility's water releases are equal or greater than the volume discharge threshold, they will be required to report data on all the NPRI substances regardless of the substance mass or volume in the effluent, as well as BOD, COD and TSS (see section 2 of this document)"

CWWA's members were extremely concerned by the requirement to report all substances regardless of substance mass or volume. Expanding reporting to ALL 343 substances currently included on the NPRI, will mean that wastewater and other industrial facilities discharging to water will be required to report based on the MDL for numerous substances. This reporting will provide absolutely no insight into pollution entering Canadian waterways, and will offer distorted and inflated pollution values to the public and media. There are also no generation factors for all the parameters.

Any expansion of NPRI reporting increases the time and financial burden of completing reports. This needs to be balanced with the value for regulators, citizens and other end users of NPRI data. In this case, we do not feel the expansion of reporting to include the three new substances will provide enough meaningful data to justify the increased reporting burden, at least for wastewater treatment facilities.

Two of CWWA's members – City of London and the Regional Municipality of York reviewed the proposal and submitted additional technical comments on the discussion document (City of London's response attached).

Sincerely

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