



# Experience on System-wide ECAs for Wastewater / SWM Systems by Ontario Municipalities

Prepared by:  
WEAO – Government Affairs Committee

In partnership with:  
City of Greater Sudbury, Region of Halton, City of Barrie, and Region of Peel

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# Who is GAC?

- WEAO committee established in June 2017
- Mandate:
  - To monitor and review existing and proposed legislation, regulation, and policies.
  - To advise WEAO Board and membership on government affairs and policies
  - GAC does not do lobbying / advocacy
- GAC has 15 committee members
- Communication plan

# GAC work to date

- **EBR letters**

- Lake Erie TP Reduction – May 2017
- LID Manual – Dec 2017 (support CSC's efforts)
- Climate Change Adaptation – Jan 2018

- **Meetings**

- 5 regular meetings @ WEAO offices
- 1<sup>st</sup> MECP/OWWA/OMWA Executive (Apr 2018)
- 1 meeting hosted by MECP (Sep 2018)

# GAC work to date (cont.)

- **Influent magazine articles**
- GAC Kick off – Fall 2017
- Lake Erie – WEAO's comments – Fall 2017
- MECP 1-year Standard, CA roles – Spring 2018
- Climate Change Adaptation – Spring 2018
- MECP/WEAO/OWWA/OMWA Group – Summer 2018
- GAC Study, System-wide ECA – Fall 2018

# GAC work to date (cont.)

- **Policy priorities (Board-approved) – new partnerships with OMWA and OCSI**
- Support of research and pilot projects (new technologies)
- I/I on collection systems
- Water quality trading
- Stormwater infrastructure resiliency / Climate change adaptation
- Review of DRAFT LID manual

# System wide ECA

- Why we did it?
- Basic message
- The issues
- Chronology of System-wide ECAs
- Analysis
  - **Survey A** – Halton, Sudbury, Barrie, and Peel
    - Cost benefit review
  - **Survey B** – MWWRC& WW Practitioners Group
- Conclusions
- Recommendations

# Introduction

- Study prepared for the MECP / OMAFRA / OCWA – Engineer’s Day, May 9, 2018
- Since then, additional discussions have occurred with the MECP regarding the future of the System-wide ECA
- Sep 19, 2018, SOWC workshop attended by WEAO, the MECP stated: “***System-wide ECAs are a ministry priority for sewage systems***”



# Basic message

- The System Wide ECA for municipal sanitary and stormwater collection systems are seen as **very positive rule instrument that brings significant benefits to municipalities:**
  - Brings unapproved infrastructure **into compliance**
  - Supports a **risk-based approach** for low risk sewage works
  - Municipal **incentives** for system **performance assessment**
  - Provides a **level playing field w/drinking water** permit approach
  - **Shorter timelines** for construction (LOF)
  - **Reduces municipal costs** for compliance & project development
  - Allows for **multi-media approvals** for the entire system

# The issues

- Regular ECAs are based on a **piecemeal approach** (i.e. by municipal project), resulting in 1,000s ECA
- Long waiting periods for **low risk activities**
- The removal of the **grandfathering provision** from s. 53 OWRA (2011), left many municipalities into **non-compliance**
- **Municipalities manage both** water distribution & wastewater collection systems w/ 2 regulatory frameworks

# The issues... cont.

- TOR program (1970's), provides relief to large cities, but it is based on the same **piecemeal approach and lacks a coordinated approach for:**
  - Treatment and linear systems
  - Timelines for approval for same project (2 submissions)
- MECP's2 models for **low risk activities**:
  - **For drinking water:**
    - Tech. rev. (Form 1 & 2), by cities & consultants - **(No application!)**
  - **For wastewater:**
    - Technical review either through regular submission or TOR, or
    - **LOF (No application!) – Stamped by P. Eng., approved by city**
- **TOR is good!**, but seen as an “oil lamp”... why upgrade an oil lamp, if we have electricity (System-wide/ EASR/ LOF)?

# Chronology of System-wide ECAs

MECP has been creating **pilot System-wide ECAs** for **WW & SWM – risk based approach**

Year	Description
2011	1 <sup>st</sup> WW ECA w/ LOF conditions ( <b>Durham – Harmony Creek</b> )
2012	WW ECAs with LOF conditions – <b>ongoing for private/municipal</b>
2013	<b>City of Toronto</b> appeal, Environmental Review Tribunal (ERT) (resulted in improved LOF conditions)
2013	System-wide ECA for <b>Halton Region</b>
2014	System-wide ECA for <b>Sudbury</b>
2016	System-wide ECA for <b>Barrie – Sanitary and 1<sup>st</sup> for SWM</b>
2017	System-wide ECA for <b>Peel Region</b>

# Analysis

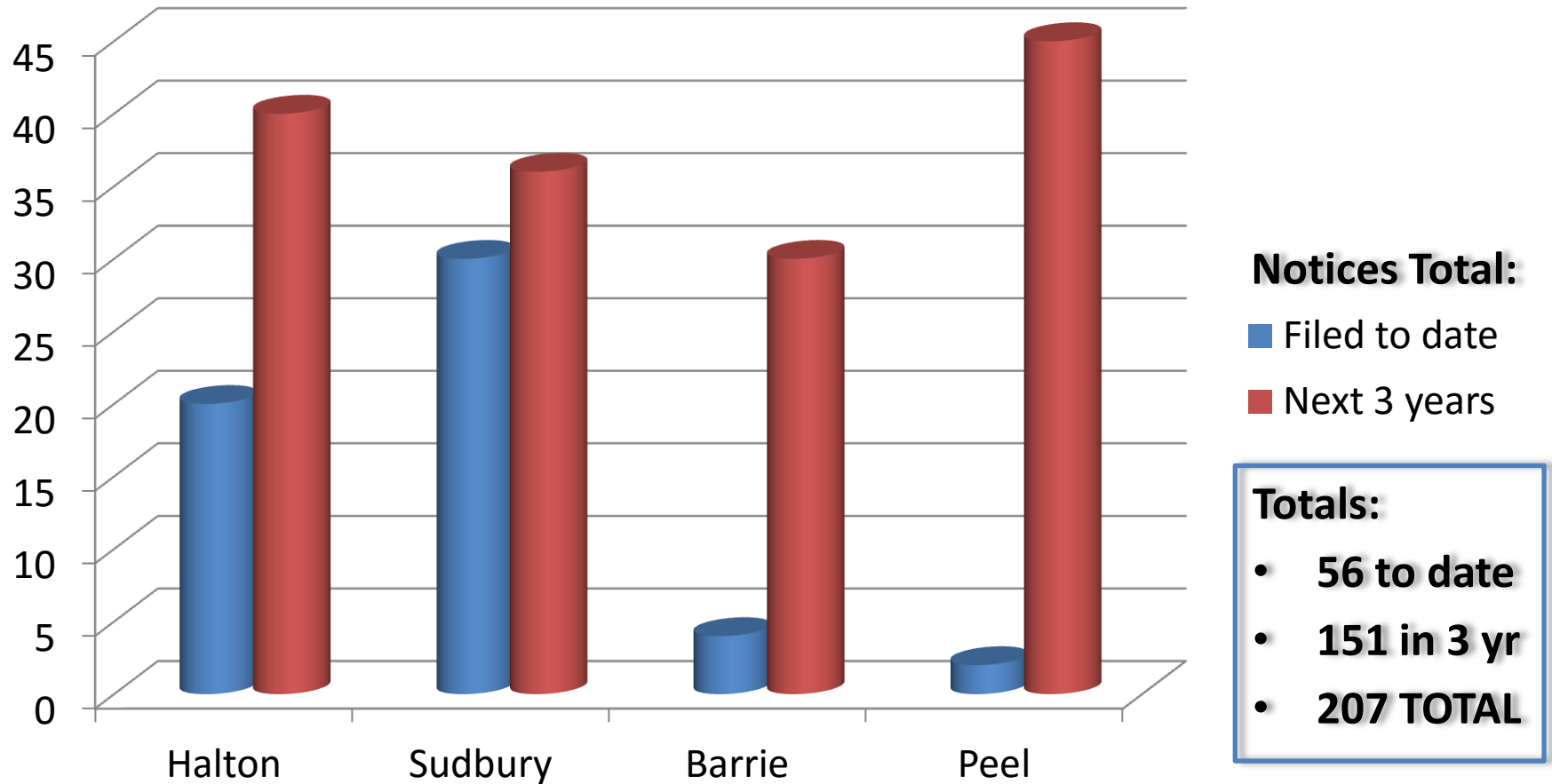
- Two (2) surveys
  - **(A) 4 municipalities** that have System-wide ECAs
  - **(B) MWWRC** – All system owners/operators & WEAO-MECP WW **Practitioners Group**
- Data gathered
  - Quantitative
  - Qualitative
- Survey involved professionals across diff. groups
  - Semi-structured questions
  - Open and closed-ended questions

# Survey A – 4 municipalities

Municipality	Syst-wide ECA	Pre-ECA Un-approved works	ECAs revoked (SPS + other)	ECAs revoked (sewer pipes)
Halton Region (Burlington system)	2013	-	17	500+
Sudbury	2014	-	28	500+
Barrie (Sanitary)	2016	1%	11	500+
Barrie (Stormwater)	2016	0%	100	100
Peel	2017	10%	37	1,000+

# Survey A... cont.

Notice of Modifications to date & expected over 3 years



*@ \$5k per application ≈ \$1 million*

# Survey A... cont.

How these municipalities perceive the System-wide ECA?

	Indicator	Negative	Neutral	Positive	Very positive
1	Clear roles & responsibilities for municipal staff, developers, and contractors			XXX	X
2	Shortened timelines for approval			X	XXX
3	Shortened timelines for project implementation		X	X	XX
4	It helps municipalities to be in compliance for the entire wastewater collection system		X	X	XX
5	Promotes consistency w/ drinking water pre-approval		X	XX	X
6	Doc. control for ECA and compliance information				XXXX
7	Consistent with Asset Management and GIS mapping		X	X	XX
8	Management for development applications		X	X	XX
9	Asist to align consistency with DWQMS			XX	XX
10	Facilitates for multi-media approval		XX		XX



# Survey A... cont.

<b>Totals:</b>	<b>Negative</b>	<b>Neutral</b>	<b>Positive</b>	<b>Very Positive</b>
	<b>0</b>	<b>7</b>	<b>12</b>	<b>21</b>

- Specific comments:
  - For timelines for approval & development applications:
    - “extending LOF to the collection system: invaluable”
    - “very helpful in cutting back bureaucracy”
    - “better than transfer of review”
    - “more guidance needed to assist cities/developers in transition to ECA”
  - For helping to be in compliance:
    - “more complex conditions than previous approvals”
    - “very simple to track and demonstrate compliance during inspections”
    - “creates streamlined approach and ability for QMS”
    - “having sewage works and air approvals in one document allows for better coordination of requirements and inventory of compliance”

# Survey A – Cost/Benefit review

- Did you have **additional costs, or savings** with System Wide ECA vs. multiple ECAs?

“The system wide ECA... saves time and money on getting the projects on the ground on time” **Sudbury**

“[we] previously had TOR, so the main benefits are simplified application and shorter timelines” **Halton**

“Probably savings due to labour hours saved on staff/contractor drafting individual applications, reviewing draft approvals, and compliance staff getting to know the ECAs. Cannot quantify savings - we don't track the hours”  
**Peel**

# Survey A – Cost/Benefit review... cont.

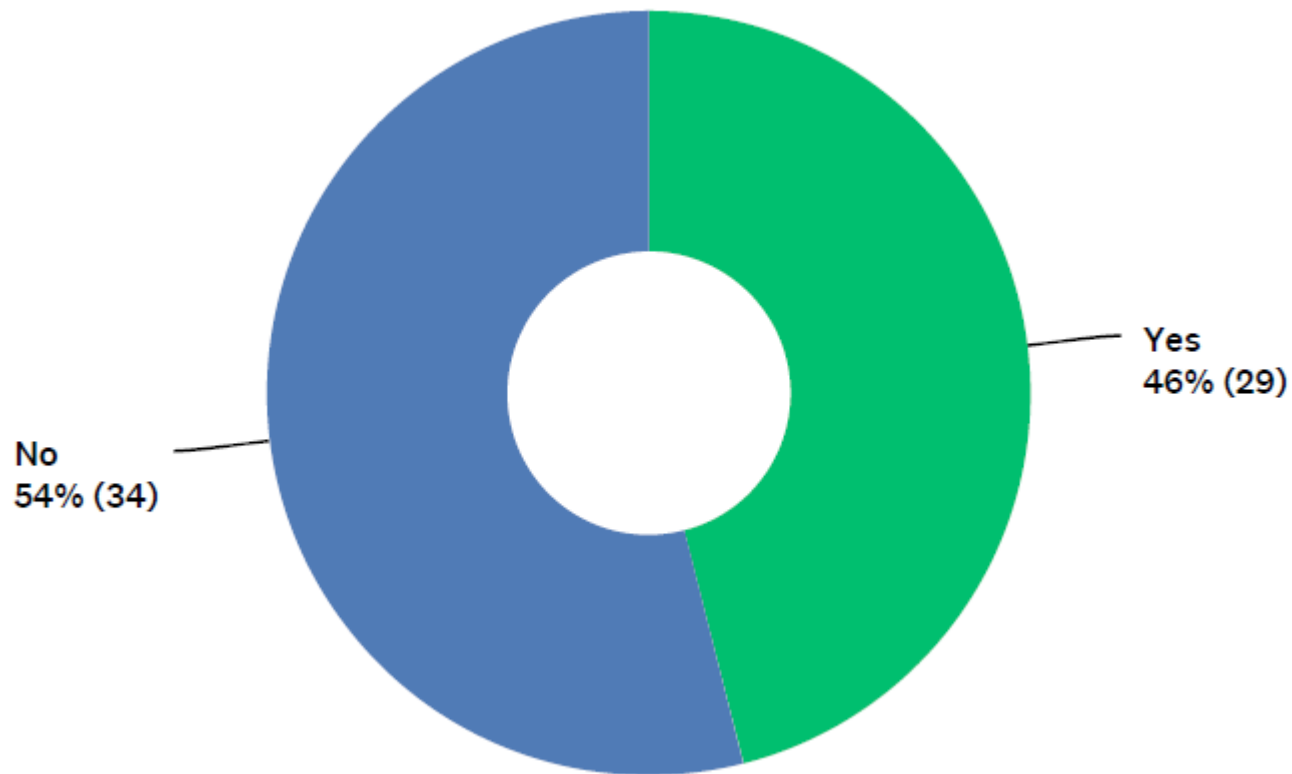
“Increased costs have been incurred to meet conditions for monitoring and reporting. Amendments to System Wide ECA’s have resulted in increased cost of administration and re-organization of internal plans and programs. These **additional costs have been offset** somewhat with consistency of requirements, alignment of processes for stormwater and wastewater and ease of management as compared to multiple ECA’s. The **stormwater ECA provides a foundation for support of stormwater priorities to assist with securing O&M funding**” Barrie

# Survey B – MWWRC & WWPG

- **10 questions** to 310 & 90 members respectively
- All **questions were reviewed** by the 4 municipalities and WEAO GAC members
- **67 responses** received between **April 13 to 30**
- Identity of respondents **confidential**
- Survey administered by Peel through an **independent administrator for QAQC purposes**

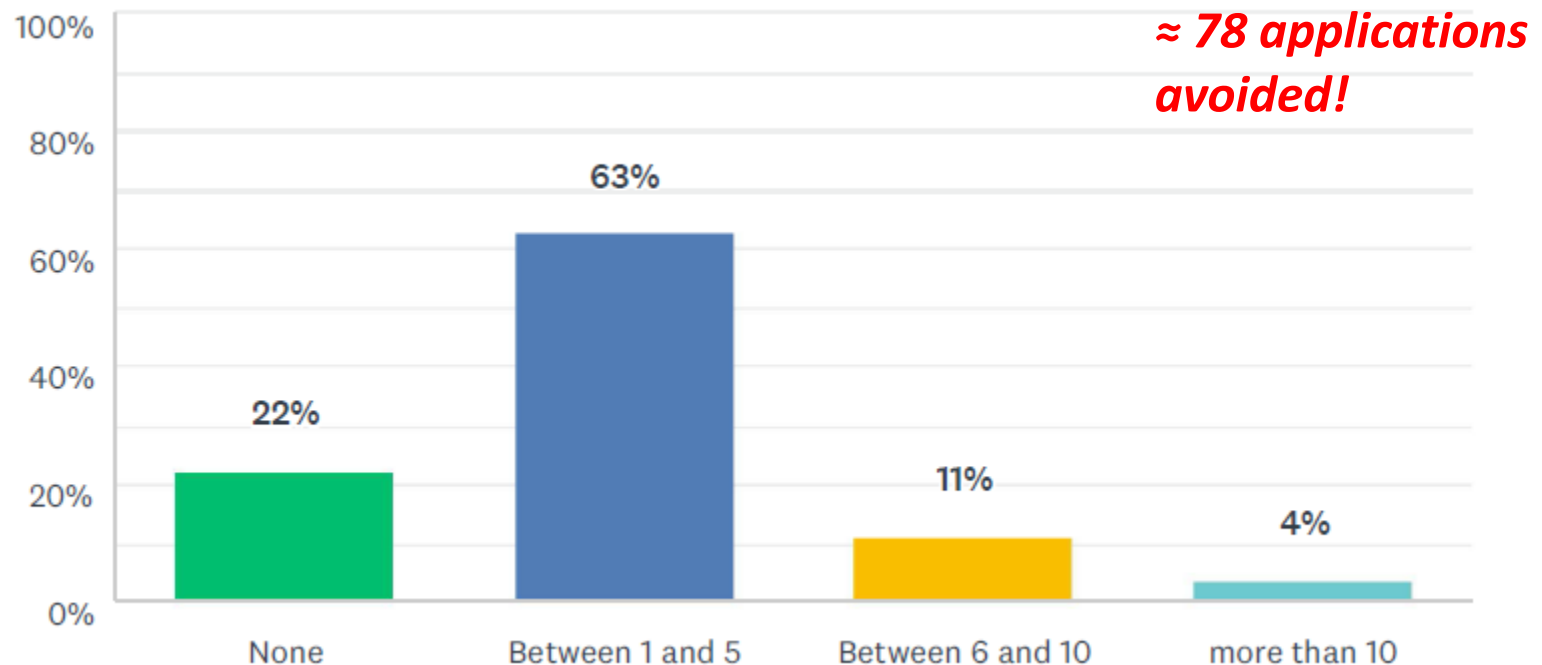
# Survey B – MWWRC... cont.

- Q1 – Do you have a municipal treatment plant or SPS ECA with LOF conditions?



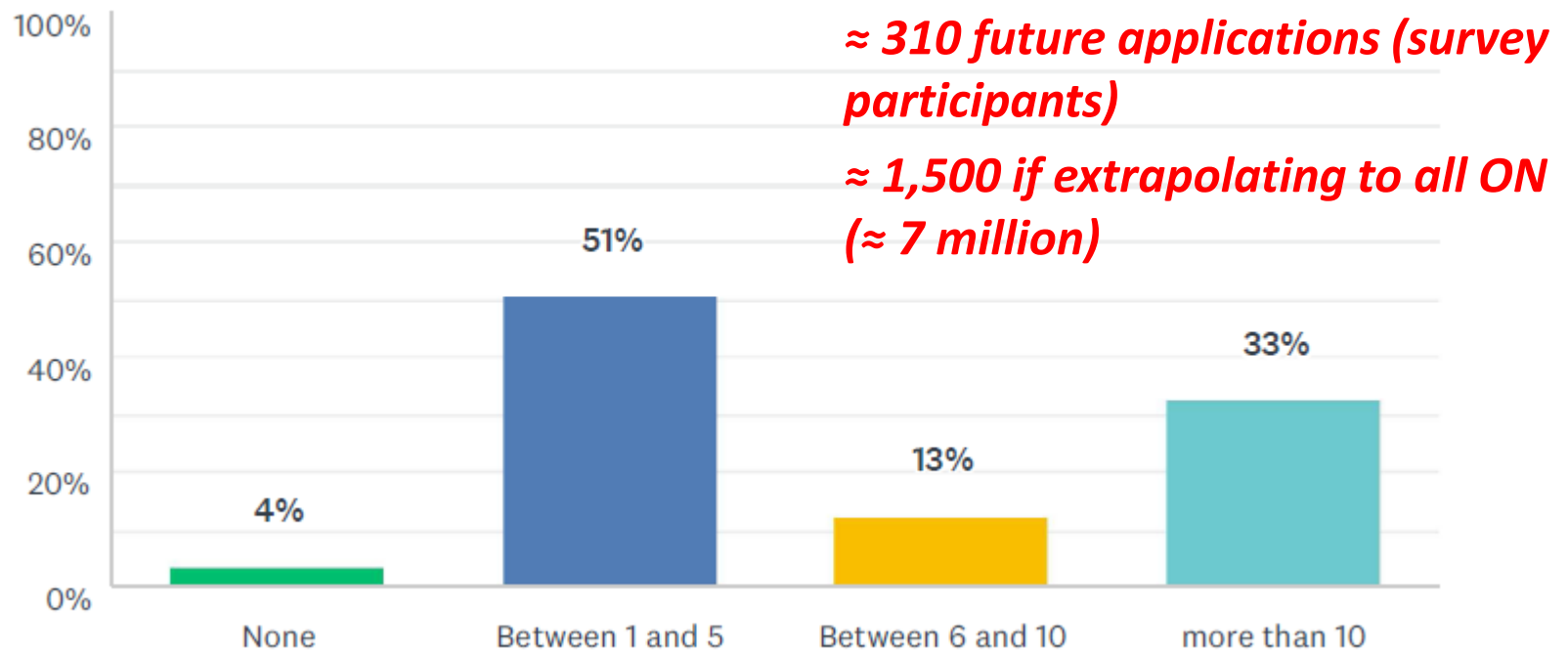
# Survey B – MWWRC... cont.

- Q2 – Approximately, how many ***Notice of Modifications*** have you filed over the past 3-years using LOF?



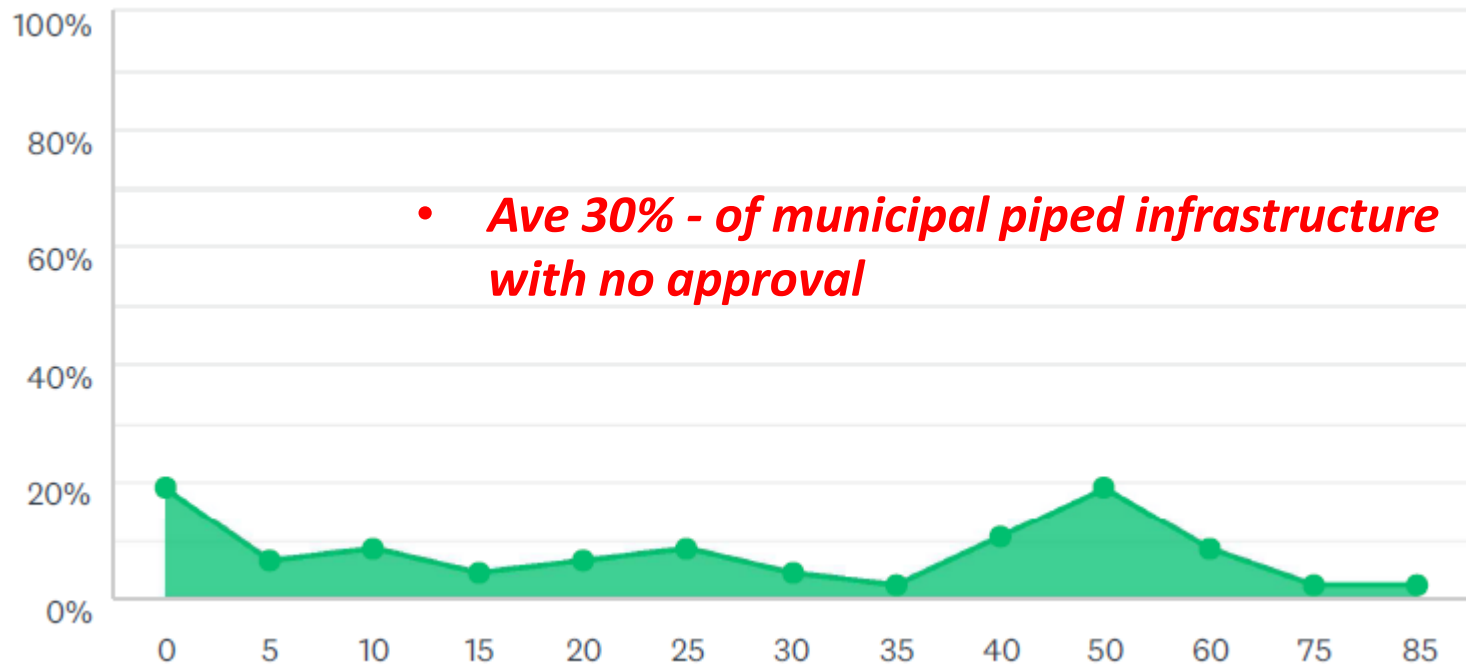
# Survey B – MWWRC... cont.

- Q3 – Approx. how many infrastructure upgrades and/or improvement projects are you planning to do on the sanitary collection system and SPS over the next 3-yrs?



# Survey B – MWWRC... cont.

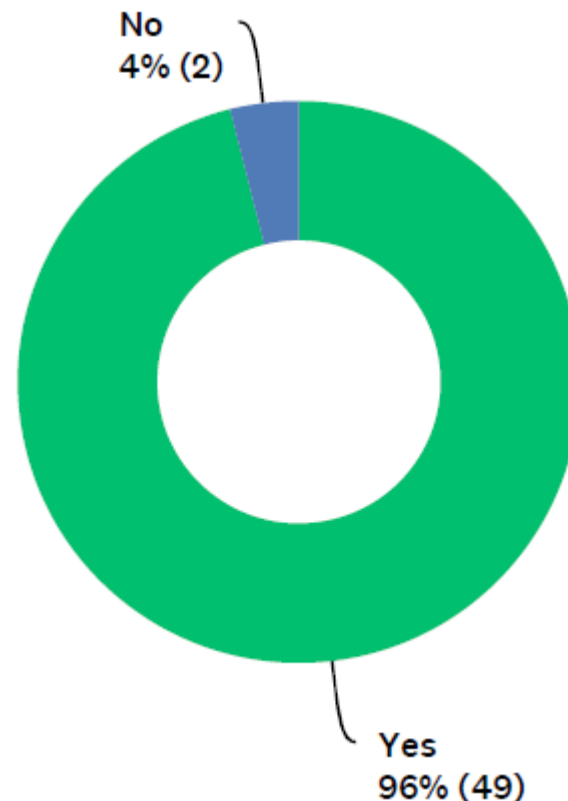
- Q4 – Approx. what % of your municipality underground infrastructure (which is still in operation) was built prior to the OWRA (1950s)?





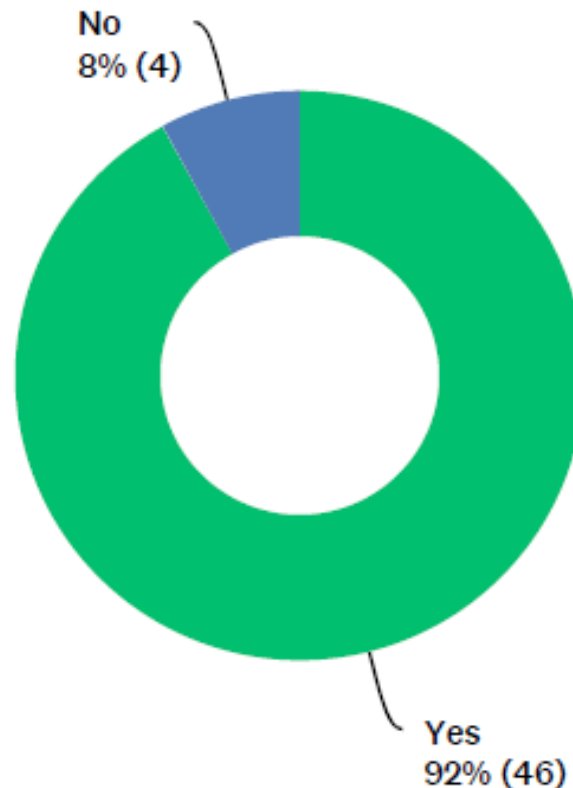
# Survey B – MWWRC... cont.

- Q5 – Would it be beneficial to have one single ECA that covers all the existing sanitary collection system, including all SPS (similar to the DWP)?



# Survey B – MWWRC... cont.

- Q6 – Would you support the MECP having a more proactive approach to System-wide ECAs for your sanitary and stormwater collection systems?



# Conclusions

## From Survey A

- System-wide ECA is seen **positive to very positive**
- **Collection System:**
  - LOF has avoided 56 ECAs
  - LOF will avoid an estimated 150 ECAs
- **LOF** will have an incremental **cost saving effect** to municipalities **and MECP**
- System-wide ECA for SWM **assists in securing O&M funding** for initiatives and programs – improves performance

# Conclusions... cont.

## From Survey B

- **96%** interest to apply
- **92%** interest in MECP more proactive approach
- **310 Low Risk future** applications represents est. **\$1.6 million** in direct savings; and allows MECP to focus on higher risk projects
- Ave. 30% of existing underground infrastr. likely under **non-compliance** (s.53 OWRA) - **“grandfathered”**

# Recommendations

- Do apply for the System-wide ECA **for sanitary collection systems and SPS only** – no need to add the STP, if the STP has LOF
- Do apply for System-wide ECA for **Stormwater Systems (treatment inclusive)**
- By having a System-wide ECAs this will have a **significant incremental effect on cost savings** to municipalities
- MECP should work with municipalities/WEAO to develop **information sheets** and guidelines

# Recommendations (cont.)

- Do's and Don'ts:
  - a. Do have a pre-submission consultation meeting
  - b. Do not include new sewage works
  - c. Do not describe the system in too much detail
  - d. Do not bother finding all ECAs – will be revoked
  - e. Do include all SWM treatment and collection
  - f. Do not include sanitary WWTP (those already have LOF)

# Basic message

- The System Wide ECA for municipal sanitary and stormwater collection systems is seen as **very positive rule instrument that brings significant benefits to municipalities:**
  - Brings unapproved infrastructure **into compliance**
  - Supports a **risk-based approach for low risk** sewage works
  - It provides **incentives** for system **performance assessment**
  - Provides a **level playing field w/drinking water** permit approach
  - It uses GIS mapping as a regulatory tool (update @ 5 years)
  - **Shorter timelines** for construction (LOF)
  - **Reduces municipal costs** for compliance & project development

***Thanks!***

***Questions?***

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