

Information Request Form Crystal Springs Lagoon Project

**Information Request
Number:**

REPLY to Information Request No. 6

Submitted by:

The Proponent

Date Submitted:

February 27, 2026

Subject Matter:

Emergency Discharge

Reference document:

N/A

Request 1: In Ontario within the Lake Erie Watershed, if the lagoon systems are overwhelmed hydraulically and the lagoon operator requests an emergency discharge, the lagoon operator will add alum near the discharge pipe to reduce the amount of phosphorus being unloaded. Provincial data and emergency reports indicate that at least 50 municipal wastewater lagoons across Manitoba (primarily in the Red River Valley and Interlake regions) were granted emergency discharge authorizations or "Licence Suspensions" by the Province in 2022. Has the Proponent prepared an emergency management plan that contemplates, *inter alia*, the addition of alum near the lagoon discharge pipe in the event of an emergency discharge? If not, why not?

Reply 1: All Provincial territories have their own regulations for environmental protection that vary from Province to Province. To the best of BMCE's knowledge, and based on review by the provincial regulator, Manitoba

Environment and Climate Change, the wastewater lagoon that is the subject of this proceeding has been designed to meet applicable Manitoba Provincial Regulations.

The Proponent is unaware of the lagoon design and specific circumstances related to each of the referenced 50 lagoons that required an emergency discharge. The subject lagoon has been designed with safety factors to minimize the potential that an emergency discharge is required at all.

For example, the lagoon was designed for a full build out of the community with an occupancy load of 250 persons, while most colonies never exceed 175 before they split to a new site. The initial colony population is anticipated to be approximately 75 to 100 people, less than 50% of the lagoon design capacity.

The potential for emergency discharge, while highly improbable, could exist under the most extreme conditions. The Proponent states that if the CEC and MCC feel appropriate, a condition of the license could include a requirement that the Proponent develop and maintain an Emergency Response Plan that would be submitted to and accepted by MCC.