



**Planning &
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TOWN OF AJAX

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May 5, 2015

Barry Laverick
Project Manager
Durham Region
605 Rossland Road East
Whitby ON
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Wayne Green
Project Manager
York Region
17250 Yonge Street
Newmarket ON
L3Y 6Z1

Dear Messrs. Laverick and Green:

Re: Town of Ajax's Response to the Regions' Submission to the Ministry of the Environment and Climate Change, dated March 11, 2015 "Technical Memorandum Regarding Actiflo™ Process for Tertiary Treatment at the Duffin Creek Water Pollution Control Plant (WPCP), Pickering, Ontario"

In response to your letter and the Region's Technical Memorandum submission to the Ministry of the Environment and Climate Change (MOECC) on March 11, 2015, I am forwarding the attached Technical Memorandum, prepared by Dr. Martin Auer, which was submitted by Gowlings, on the Town's behalf, to the Environmental Approvals Branch of the MOECC on May 4, 2015.

The key legal and technical findings of Dr. Auer's Technical Memorandum are listed below:

- For the first time, the Regions have acknowledged that Actiflo™ could be successfully implemented at the Duffin Creek WPCP, in contrast to the Regions' previous position in the Environmental Study Report that Actiflo™ was unproven, unreliable and unworthy of consideration;
- The conceptual design acknowledges that Actiflo™ can reduce Total Phosphorus discharges by 74% or more and achieve even further reductions in Soluble Reactive Phosphorus;
- Despite the above, the Regions continue to ignore the unparalleled opportunity this (use of Actiflo™) presents to prevent nuisance algae growth in Ajax's nearshore;
- The capital cost of Actiflo has been overestimated, by designing to treat 945 MLD, which is 50% more or 1.5 times greater than the WPCP's actual maximum capacity (630 MLD). In doing this, the Regions applied a different approach to Actiflo™ than to the alternatives evaluated in the Outfall EA (in effect, penalizing the Actiflo™ alternative); and
- Actiflo's operating costs may have been significantly overestimated, by designing for its use year round. If it were only used for 4-5 months (during the algae growing season), as previously recommended by Dr. Auer, operating costs would be cut by 33-42% of the Regions' estimated costs.

These findings were sent to the MOECC for consideration prior to issuance of a Minister's decision regarding the Town's Part II Order Request in relation to the Duffin Creek WPCP Outfall Schedule C Municipal Class Environmental Assessment.

Sincerely,



Paul Allore, M.C.I.P., R.P.P.
Director of Development Services
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Encl.: Technical Review prepared by Dr. Martin Auer

cc: Mayor & Council
Mary Hennessy, Director, Environmental Approvals Branch, MOECC
Jennifer Danahy, Gowling Lafleur Henderson LLP