



**Planning &  
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**TOWN OF AJAX**

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May 26, 2015

John Presta  
Director, Environmental Services  
Works Department  
Durham Region  
605 Rossland Road East  
Whitby ON  
L1N 6A3

Mike Rabeau  
Director, Capital Planning and Delivery  
Environmental Services  
York Region  
17250 Yonge Street  
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Dear Messrs. Presta and Rabeau:

**Re: Town of Ajax's Response to the Regions' Letter of May 21, 2015  
Duffin Creek Water Pollution Control Plant (WPCP) Outfall EA  
Schedule C Municipal Class Environmental Assessment**

We received your May 21, 2015 written response to Mayor Parish's May 5, 2015 letter to the Regional Chairs, and my letter to the Outfall EA Project Managers Barry Laverick and Wayne Green also dated May 5, 2015.

As you know, our review of the Regions' March 11, 2015 submission package to the Ministry of the Environment and Climate Change which included a transmittal letter from the Project Managers and a Technical Memo from CH2M Hill entitled "Conceptual Design of Actiflo™ Process for Tertiary Treatment at the Duffin Creek WPCP", identified numerous issues related to the applicability and effectiveness of Actiflo™ treatment technology.

Our review of the ESR indicates Actiflo™ was not properly assessed as part of this Class EA and was thus not reported as a viable alternative. When defining the problem to be addressed by the Outfall EA, the Regions chose not to consider that nutrient loads in the WPCP's effluent could be the driver of excessive nuisance algae growth in the Ajax nearshore. Consequently, the ability of Actiflo™ treatment technology to be a viable "solution" was not evaluated.

Your letter states "... the Regions agreed to investigate the feasibility of an Actiflo™ pilot study at the request of the Town of Ajax ...". My recollection is that we asked the Regions to conduct "in-Plant testing" for a short period of time to allow a properly informed decision about using Actiflo™ technology in this WPCP. If the "in-Plant testing" was successful, Actiflo™ technology would be installed and become operational in the WPCP.

In conclusion, all this back and forth debate confirms the need for a full Individual EA to be conducted.

Sincerely,



Paul Allore, M.C.I.P., R.P.P.  
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