

November 12, 2017

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Ministry of the Environment and Climate Change
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Hello Ms. Trevisan:

Re: Proposed hydro-electric generating station at the Bala falls

Summary

The proponent's work is not conforming to their Environmental Compliance Approval.

The bigger concern is they appear to be using a bunch of impressive-looking hoses and equipment that is actually all for show, and does not actually treat or filter the water at all.

Detail

Today the proponent began pumping water from their proposed excavation. However, their work does not conform to their Environmental Compliance Approval or the information I received when meeting with your approvals staff on October 2, 2017, as follows:

- 1) The ECA states that four settling tanks are to be used (*"Aquatech Models or approved equivalent"*), but the proponent is not using any settling tanks. They initially installed six contaminated shipping containers, but they have now abandoned all these and are not using them.
- 2) The manufacturer of these shipping containers treated the floors with insecticides, and the proponent pumped water into one or two of these shipping containers, so this water would now be contaminated. Please reply what steps the proponent must follow to properly dispose of this water and the shipping containers.
- 3) The ECA states that a *"Bag Filtration System (Ultra Tech Model 9727-O/S or approved equivalent)"* is to be used, but they are not using any bag filtration system. The proponent is discharging water from a pipe directly into the Moon River.
- 4) The proponent has three hoppers and a large tank which could be a: *"Proprietary Wastewater Treatment Plant"*, as the ECA specifies, however:
 - a) This system is to have a: *"membrane filtration system"*, but there is no indication it has any filtration or treatment of the water passing through.
 - b) This system is to be used in addition to settling tanks and a bag filtration system, but it is being used without any settling tanks or bag filtration system.
 - c) The supplier's web site refers to the large tank on-site as a: 25 yd³ liquid tight vacuum box, intended to: *"Consolidate vacuum truck contents for storage and transportation savings."* That is, this tank is only to store and transport materials, and does not provide filtration or treatment.

That is, it appears the proponent has just connected some hoppers and pipe to a storage tank and is pumping this water directly into the Moon River without any treatment or filtration.

- 5) The ECA requires testing of the discharge water to the Moon River, but the equipment configured does not provide a way to get a sample of this discharged water for testing.
- 6) At the meeting on October 2, 2017 Mr. Nizamuddin informed me that the pipe to the settling tanks would be a: "*flexible steel pressure pipe*", and the proponent's drawing showed this pipe would be mostly along the ground, with a portion suspended from the District Municipality of Muskoka's bridge over the Bala south channel. This is not what is installed.

Instead, the proponent has installed:

- a) Many sections of plastic pipe. They have not done any testing of the connections they made between these sections, other than to just run their pump. This is inadequate as the pipe is over the Bala south channel, so is too far away to observe any leaks.
 - b) This plastic pipe is suspended along a 200' steel cable, so the plastic pipe will sway and flex in the wind. This pipe may not be rated for such flexing in colder temperatures.
- 7) I continue to await your confirmation that you have personally seen the proponent's claimed October 2016 test results that the Zinc levels from all three boreholes were undetectable, meaning less than 5 µg/L.

As the proponent's work does not appear to be conforming to their ECA, please reply to each of these issues.

Sincerely,



Mitchell Shnier, on behalf of SaveTheBalaFalls.com

Cc: The Honourable Chris Ballard, Minister, MOECC, CBallard.mpp.co@liberal.ola.org
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