

Ministry of the Environment,
Conservation and Parks
Southwest Region
733 Exeter Road
London, ON N6E 1L3
Phone: 519-873-5000

Ministère de l'Environnement, de la
Protection de la nature et des Parcs
Région Sud-Ouest
733 rue Exeter
London, ON N6E 1L3
Tél: 519-873-5000

June 27, 2025

Jennifer Pereira,
Director of Legal and Legislative Services/Clerk,
The Corporation of the Municipality of Strathroy-Caradoc,

I am the Water Compliance Supervisor with the London District Office of the Ministry of the Environment, Conservation and Parks (the "Ministry").

The Municipality of Strathroy-Caradoc ("the Municipality") owns and operates the wastewater treatment facility known as the Mount Brydges Wastewater Treatment Plant (the "Mount Brydges WWTP"), currently approved under environmental compliance approval No. 2865-CYQLVH issued August 29, 2024 (the "ECA"). The Mount Brydges WWTP was previously approved under environmental compliance approval No. 5977-CPKPGM issued December 20, 2023 (the "2023 ECA") and environmental compliance approval No. 7788-8BJRL8 issued January 26, 2011 (the "2011 ECA").

I am writing to set out the Ministry's concerns with the operations of the Mount Brydges WWTP, which may be resulting in the contravention of the *Ontario Water Resources Act* ("OWRA"). In particular, the sewage works do not currently have the ability to treat the influent they receive to the required standard, which has resulted in repeated discharges of partially treated sewage to Versmeersch Drain and ultimately to the Thames River, that may result in the impairment of water.

Background

The existing Mount Brydges WWTP is a Rotating Biological Contactors ("RBC") system with a rated capacity of 825 m³/d. The design is known to be impacted by seasonal temperature changes.

The Mount Brydges WWTP has historically struggled with performance and the ability to meet effluent criteria. These concerns have been summarized by the Municipality in its Annual Reports which have documented a number of historical performance issues with the works.

The following two charts are taken from the last two Annual Reports submitted to the Ministry by the Municipality. These charts detail the number and type of ECA effluent limit exceedances reported in the 2023 and 2024 Annual Reports:

2023

Parameter	Exceedance Result mg/L	ECA Effluent Limit mg/L	# Months in Compliance with ECA Limit / # Months
Suspended solids (non-freezing period Apr-Nov)	Apr 11.25 May 10.8 Aug 17.75 Sept 12.75 Oct 11.2 Nov 12.5	10	2/8
Total phosphorus (non-freezing period Apr-Nov)	Aug 0.52	0.5	7/8
Total ammonia nitrogen (non-freezing period Apr-Nov)	Apr 6.3 May 7.92 June 8.88 July 3.52 Sept 5.15 Oct 7.22 Nov 9.75	3	1/8
Total ammonia nitrogen (freezing period Dec-Mar)	Jan 14.18 Feb 6.9 Mar 7.0 Dec 11.33	5	0/4

2024

Parameter	Exceedance Result mg/L	ECA Effluent Limit mg/L	# Months in Compliance with ECA Limit / # Months
Suspended solids (non-freezing period Apr-Nov)	10.5	10	7/8
Total ammonia nitrogen (non-freezing period Apr-Nov)	Apr 14.9 May 10.22 June 5.38 Sept 4.25 Oct 6.5 Nov 10.3	3	2/8
Total ammonia nitrogen (freezing period Dec-Mar)	Jan 8.55 Feb 8.38 Mar 13.15 Dec 13.48	5	0/4

I believe that the above exceedances of the effluent limits in the ECA for the Mount Brydges WWTP are contraventions of subsection 53(1) of the OWRA.

Subsection 53(1) of the OWRA prohibits any person from using, operating, establishing, altering, extending or replacing a new or existing sewage works except under and in accordance with an environmental compliance approval.

In addition, I believe that these discharges of partially treated sewage are contraventions of subsection 30(1) of the OWRA, as they may impair the quality of the water of Versmeersch Drain.

Subsection 30(1) of the OWRA prohibits any person from discharging, causing, or permitting the discharge of any material of any kind into or in any water or any shore or bank thereof or into or in any place that may impair the quality of the water of any water.

Current Status

The Municipality contracted R.V. Anderson Associates (“RVA”) to review the process and design an interim solution for the effluent limit exceedances experienced at the Mount Brydges WWTP.

In February 2023, the Municipality provided the Ministry with a preliminary design report from RVA entitled, “Mount Brydges Wastewater Treatment Plant Interim Solution” (the “Interim Solution”). This Interim Solution was discussed with the Ministry and a subsequent application to amend the 2023 ECA was submitted by the Municipality and approved by the Ministry in the ECA issued on August 29, 2024.

The improvements proposed in the Interim Solution and approved in the ECA have not been implemented by the Municipality to date. Total Ammonia nitrogen exceedances have continued into 2025 and have been exacerbated by equipment failure at the Mount Brydges WWTP.

As detailed in the Interim Solution, I understand that the influent flow for the Mount Brydges WWTP is experiencing an upward trend that will require a long-term solution as the Interim Solution does not increase the existing treatment capacity.

Based on the above, I believe that further exceedances of the ECA effluent limits at the Mount Brydges WWTP are likely to occur contrary to subsections 53(1) and 30(1) of the OWRA, if the Municipality does not take additional steps to address the treatment capability of the works.

As you may know, contravening subsections 53(1) or s. 30(1) of the OWRA is an offence and may result in my taking enforcement actions such as the issuance of an order and/or referral to the Ministry’s Environmental Investigations and Enforcement Branch for an investigation.

Next Steps:

It is the Ministry's expectation that the Municipality will take all appropriate steps to ensure that there are no further contraventions of the ECA or OWRA, which includes steps to address the chronic ECA effluent limit exceedances at the Mount Brydges WWTP.

I understand that the Municipality had developed a plan to address the limited treatment capabilities of the Mount Brydges WWTP that includes updates to the existing works as an interim solution and/or the construction of a new treatment facility as a long-term solution.

The Interim Solution proposed by the Municipality to update the works has been approved under the ECA and the Municipality has demonstrated that the updated works would have the capability to treat the influent directed to this works and meet applicable Ministry standards.

Lastly, I note that the Municipality is considering construction of a new treatment facility to meet the Municipality's long-term needs. This process requires a Municipal Class Environmental Assessment and would take years to implement. If this is the path chosen by the Municipality, it is the Ministry's expectation that the Municipality will implement interim measures to prevent any further discharge of partially treated sewage contrary to the ECA and OWRA in the intervening period.

Please provide me with a written response to this letter by July 30, 2025, to mark.smith@ontario.ca that describes (a) the Municipality's proposed interim measures for preventing further effluent limit exceedances contrary to the ECA and (b) the Municipality's preferred long-term option for addressing the treatment capabilities of the Mount Brydges WWTP. Please be advised that failing to provide me with the requested written response may result in my taking additional enforcement action, such as the issuance of orders.

If you have any questions regarding this issue, please contact the undersigned.

Regards,

A handwritten signature in black ink, appearing to read 'M. Smith', is positioned below the 'Regards,' text.

Mark Smith

Water Compliance Supervisor
London District Office
Drinking Water and Environmental Compliance Division
Ministry of the Environment, Conservation and Parks
Mark.smith@ontario.ca
519-317-8116