RECOMMENDATION:

(a) That Sewer Use By-law 04-150, as amended, be further amended as follows:

   (i) commencing January 1, 2010, eliminate “phenolic compounds” from the list of parameters for which an overstrength discharge agreement can be established;

   (ii) commencing March 1, 2009, eliminate the acceptance of hauled sewage from outside of the municipal boundaries of the City of Hamilton;

   (iii) commencing September 1, 2009, eliminate the acceptance of hauled “industrial waste”, except where the generator has a current permit from the City of Hamilton authorizing the acceptance of such waste;

(b) That the City Solicitor be authorized and directed to amend Sewer Use By-law 04-150, as amended, to implement subsection (a) above.

EXECUTIVE SUMMARY:

A review of existing sewer use agreement policies and hauled waste management in the City of Hamilton was undertaken.
The review examined two types of agreements currently allowed under the Sewer Use By-law, specifically:

- Overstrength Discharge Agreements, which allow the City to recover the costs for treating the six overstrength parameters that are not in compliance with the By-law limits; and
- Compliance Agreements, which establish a time frame for the discharger to undertake measures to bring the discharges into compliance with the By-law limit.

The review found the following with respect to these agreement types.

**Overstrength Discharge Agreements**

The review concluded that overstrength discharge agreements are a legitimate tool for municipalities to use to recover the costs associated with conveying, treating, and monitoring overstrength discharges.

Currently, the Sewer Use By-law allows overstrength discharge agreements for suspended solids (TSS), biochemical oxygen demand (BOD), phenolic compounds, solvent extractable matter of animal or vegetable origin (oil and grease, animal/vegetable), Total Kjeldahl Nitrogen (TKN) and phosphorus.

The review found that there was insufficient justification to allow overstrength discharge agreements for total phenolic compounds, and recommended that this parameter be removed from the list of allowable overstrength parameters. There were no changes for the other parameters.

**Compliance Agreements**

Compliance agreements are used to allow businesses with out-of-compliance sewage discharges appropriate time to install the necessary treatment equipment, or implement the necessary process changes, to bring their discharges into compliance with the Sewer Use By-law. The review found that compliance agreements are an acceptable interim solution, and the current time frame of six months from the time the non-compliant discharge is identified, with extensions provided only upon review by the Senior Director of Water and Wastewater (acting as the designate of the General Manager of Public Works), is appropriate.

**Hauled Sewage Management**

The review found that certain quantities of hauled sewage were coming from generators located outside of the City and recommended that the Sewer Use By-law be amended to eliminate the acceptance of hauled sewage from outside of the municipal boundaries of the City of Hamilton.

The review found that in order to better control what types of hauled sewage enter the City’s facilities, the Sewer Use By-law should be amended to eliminate the acceptance of hauled “industrial waste” (as currently defined in the By-law), except when the generator has a permit from the City of Hamilton authorizing the acceptance of such waste.
The recommendations contained within this Report have City wide implications.

The City of Hamilton regulates the use of the City’s sanitary, combined, and storm sewers through the Sewer Use By-law. Among other things, this By-law establishes limits for the concentration of various parameters in discharges to the City's sewers, and provides for four types of agreements with sewer users whose discharges would not otherwise comply with various aspects of the By-law. The types of agreements include:

- Overstrength Discharge Agreements, which allow the City to recover the costs for treating the six overstrength parameters that are not in compliance with the By-law limits,
- Compliance Agreements, which establish a time frame for the discharger to undertake measures to bring the discharges into compliance with the By-law limits,
- Sanitary Sewer Surcharge Agreements, which allow the City to charge sewer users directly for treatment of sewage that results from water not supplied by the City’s water distribution system,
- Chlorides Discharge Agreements, which regulate the discharges of chlorides and allow the City to recover the costs for any likely reduction of the life span of any sewage works as a result of the discharge.

The By-law also regulates the discharge of hauled sewage into the City’s sewage system, establishing fees for the discharge of hauled sewage, and regulating where, when, and who may use the City’s sewage collection system for this purpose.

In 2007, the City retained a consultant, R.E. Poisson Engineering Inc. to review the sewer use agreement and waste hauler policies outlined in the Sewer Use By-law, specifically with reference to the following:

- The impact and appropriateness of the City’s policy of allowing overstrength discharge agreements with sewer users whose discharges are in excess of the limits specified in the By-law for treatable parameters,
- The impact for the City of the current policy of entering into compliance agreements with sewer users whose dischargers are in excess of the limits specified in the By-law for non-treatable parameters, and
- The impact for the City of the current hauled sewage management policies.

The scope of the project included:

- A review of existing background reports;
- Interviews with key senior staff;
- Making recommendations for changes either to the By-law or in the administration of the By-law where necessary to meet the City’s policy objectives; and
- Host Public Information Centres to get feedback on the results prior to bringing a Report to Council for approval.

In addition to the above, a Motion at the Audit and Administration Committee meeting of October 17, 2007 amended the scope to include a review of the Environmental Commissioners report dealing with Overstrength Discharge Agreements and/or Compliance Agreements and directed that the Environmental Commissioners Office be
interviewed about their concerns regarding Overstrength Discharge Agreements and/or Compliance Agreements.

Where gaps in the existing background information existed or where there was not enough information available to properly advise the City, the consultant was advised to make a recommendation for further study. This occurred in one instance, and an assignment was provided to Conestoga Rovers & Associates to conduct the following activities relevant to the scope of this assignment:

• Review whether “phenolic compounds”, as defined in the By-law, should remain on the list of parameters for which overstrength discharge agreements can be made;
• Review whether TKN should remain on the list of parameters for which overstrength discharge agreements can be made.

**ANALYSIS/RATIONALE:**

**Overstrength Discharge Agreements**

Overstrength discharge agreements allow municipalities a mechanism to recover the costs of conveyance, treatment, and monitoring of wastewaters which exceed specific parameter limits established by sewer use by-laws.

Overstrength discharge agreements were included in the original Municipal Engineers Association’s (MEA) 1975 Sewer Use By-law and in the Ontario Ministry of the Environment’s 1988 Model Sewer Use By-law. As such, they are a component of all sewer use by-laws in the Province of Ontario. They will likely become a national standard as well, as they are also included in the current Canadian Council of Ministers of the Environment (CCME) Draft Sewer Use By-law.

The review concluded that overstrength discharge agreements are a legitimate cost recovery tool with the proviso that overstrength discharge agreements should only be entered into if the following conditions can be reliably met:

i. They shall only be entered into for conventional parameters that can be treated at the municipal wastewater treatment plant and for which there is a plant effluent sampling and analysis program with agreed upon effluent criteria;
ii. They shall only be entered into if there is sufficient capacity at the plant to treat the additional loads resulting from the overstrength discharge agreements;
iii. Fees charged should account for all additional costs associated with the treatment of these wastes, including the cost of additional monitoring, sampling, and analysis, and operation, maintenance, and capital replacement of affected infrastructure;
iv. All other requirements of the Sewer Use By-law, including the protection of the sewage collection system and the health and safety of the workers, must be complied with.

Currently, the City of Hamilton’s Sewer Use By-law allows overstrength discharge agreements for total suspended solids (TSS), biochemical oxygen demand (BOD), total phenolic compounds (4AAP), solvent extractable matter of animal or vegetable origin (oil and grease, animal/vegetable), Total Kjeldahl Nitrogen (TKN) and phosphorus. A comparison of the various parameters for which other municipalities allow overstrength discharge agreements is presented in the Appendix.
The review found that currently at the Woodward Avenue Wastewater Treatment Plant, the above four conditions could only reliably be met for BOD, TSS, Oil and Grease (Animal/Vegetable), and Phosphorus. Both TKN and total phenolics required further evaluation with respect to Overstrength Discharge Agreements.

TKN required further evaluation because there was no effluent criteria for this parameter on the Certificate of Approval (CofA) for the treatment plant, and the plant did not completely nitrify. However, the review found that while no effluent criteria exist for TKN on the plant’s CofA, there were sufficient operational objectives and plant effluent monitoring for this parameter to quantify and monitor current nitrification rates. Furthermore, the planned expansion of the Woodward Avenue WWTP is to be designed to accommodate all existing and future expected TKN loads and provide nitrification beyond the current removal rates. For these reasons, it was recommended that it was appropriate to continue to include TKN as a parameter for which overstrength discharge agreements could be established.

Like TKN, total phenolic compounds required further evaluation because there was no effluent criterion for this parameter on the CofA for the treatment plant. However, unlike for TKN, the plant did not have any operational objectives or a comprehensive sampling and monitoring program for this parameter. The review found that while significant removal of total phenolic compounds occurred at the plant (based on limited spot sampling which occurred in 2006), the removal rate did not meet the most likely criteria that would be applied to this parameter, which is the Provincial Water Quality Objective of 1 ug/L. Furthermore, the review found that the total phenolics parameter includes a wide spectrum of phenolic species, many of which are significantly more toxic than phenol. To consider total phenolics as an overstrength discharge parameter, significant work would have to be undertaken to characterize and monitor the discharges both at the specific industries involved, and at the outfall of the Woodward Avenue WWTP, for the presence of these more toxic phenol species.

Based on all of the above concerns, the review recommended that total phenolics be removed from the list of parameters for which overstrength discharge agreements could be established. The following sewer users currently have overstrength agreements for total phenolic compounds, and will be affected by this recommendation:

- US Steel Canada (formerly Stelco)
- ArcelorMittal Dofasco Inc.
- VFT Inc.
- Newalta (formerly Taro Landfill).

**Compliance Agreements**

Like overstrength discharge agreements, compliance agreements are also components of the 1988 MOE Model Sewer Use By-law and the current CCME Draft Sewer Use By-law.

Compliance agreements are used to allow businesses with non-compliant sewage discharges appropriate time to plan, design, construct, or install the necessary treatment equipment, or implement the necessary process changes to bring their discharges into compliance with the Sewer Use By-law.
The review found that compliance agreements are an acceptable interim solution. The City has reviewed all existing compliance agreements, and has instituted an initial time frame of six months, from the time the non-compliant discharge is identified, for dischargers to bring their effluent into compliance with the By-law limits. In cases where this is not possible, extensions can be provided, but only upon review by the Senior Director of Water and Wastewater, acting as the designate of the General Manager of Public Works. The review found this to be an appropriate policy.

**Hauled Sewage Management**

Not all sewage generators within the municipal boundaries of the City of Hamilton are connected to the City's sewage collection system; however, the City allows them to use the system. In such cases, their wastes are pumped from holding tanks, trucked to one of two locations in the City where it is allowed, and discharged into the sewer to be conveyed and treated at the Woodward Avenue Wastewater Treatment Plant.

In most cases, the sewage so discharged is domestic in origin, and is either domestic wastewater (holding tank waste) or the concentrated domestic waste from septic tanks. In a relatively small number of cases, the waste is industrial in origin, but non-hazardous, such as the wastewater from a winery or bakery, which is relatively benign, and is easily treatable at the treatment plant.

The Sewer Use By-law expressly prohibits the discharge of acute hazardous and waste chemicals, hazardous industrial waste, and other hazardous chemicals, whether as a component of hauled sewage, or directly into the sewer. However, there is a concern that the discharge of such materials may be going on undetected through hauled sewage operations, causing upsets at the treatment plant.

The present By-law allows the acceptance of hauled sewage from generators located outside of the City. Generally, most municipalities do not accept hauled waste generated from outside of their municipality. The Region of Niagara, City of Guelph, Region of Halton, and the City of Toronto all have restrictions written into their by-laws prohibiting this practice. The review found that the lack of such a prohibition in the current City of Hamilton Sewer Use By-law encouraged sewage waste generators from outside the City to travel to Hamilton to have their waste discharged into the City of Hamilton’s sewer system, and that the distant location of the generators of this hauled waste made it difficult to monitor or investigate the nature of these wastes.

To address the above concerns, the review recommended two changes to the existing By-law.

First, the review recommended that the Sewer Use By-law be amended to eliminate the acceptance of hauled sewage from outside of the municipal boundaries of the City of Hamilton.

And second, the review found that in order to better control what types of hauled sewage enter the City’s facilities, the Sewer Use By-law should be amended to eliminate the acceptance of hauled “industrial waste” (as currently defined in the By-law), except when the generator has a permit from the City of Hamilton authorizing the acceptance of such waste.
Through the permitting process, which would include a comprehensive and ongoing sampling and analysis program, the characteristics of the hauled waste generated from each of the industrial generators could be better defined, and the discharges controlled. It was recommended that industrial hauled waste that was permitted to be discharged would have to meet the parameter limits of the Sewer Use By-law, except for those parameters for which overstrength discharge agreements can be established. In such cases, an extra charge would be levied for the acceptance of such hauled wastes, similar to the charges levied for industrial dischargers connected directly to the City’s sewage collection system.

It is recommended therefore that the Sewer Use By-law be amended to eliminate the acceptance of hauled sewage from outside of the municipal boundaries of the City of Hamilton.

It is further recommended that the Sewer Use By-law be amended to eliminate the acceptance of hauled “industrial waste”, except where the generator has a current permit from the City of Hamilton authorizing the acceptance of such waste.

Phase-in of Proposed Changes

Some existing sewer users will be affected by the proposed changes to the Sewer Use By-law, and will likely require a certain amount of time to find new arrangements. Therefore, it is recommended that the changes to the Sewer Use By-law be phased-in, with adequate notice provided to those affected. The following phase-in dates are recommended for each of the proposed changes:

- March 1, 2009, for the elimination of the acceptance of hauled sewage from outside of the municipal boundaries of the City of Hamilton;
- January 1, 2010, for the elimination of “phenolic compounds” from the list of parameters for which an overstrength discharge agreement can be established; and
- September 1, 2009, for the elimination of the acceptance of hauled “industrial waste”, except where the generator has a current permit from the City of Hamilton authorizing the acceptance of such waste.

Comments from the Environmental Commissioner of Ontario

As directed by Council, an interview was conducted with the Environmental Commissioner of Ontario (the Commissioner) at the Commissioner’s office on March 26, 2008.

Regarding the use of overstrength discharge agreements, the Commissioner feels that such agreements are a legitimate tool for municipalities to recover the costs associated with conveying, treating, and monitoring overstrength discharges. Furthermore, the fee structure associated with these agreements should be flexible enough to allow municipalities to effectively motivate sewer users to apply pollution prevention techniques and continuous improvement. Accurate flow measurement and public reporting as well as a steadily increasing fee structure over time are likely to be components of a successful approach. The Commissioner felt strongly that the details of the agreements should be clearly available to the public. Municipalities should be very cautious about using overstrength discharge agreements for parameters that are not effectively degraded by municipal sewage treatment plants, and/or concentrations of parameters that could overwhelm the activated sludge process of the treatment plant.
Such parameters would be more suitably addressed by other approaches, such as pre-treatment.

The Commissioner also felt that if municipalities over time come to see overstrength discharge agreements as an important revenue source, and the fees collected as a result of these agreements do not go towards the operation, maintenance, and monitoring of the sewage collection system and treatment plants, that is also a concern.

Regarding the use of compliance agreements, the Commissioner found these to be an acceptable interim solution, but felt they should not be used to legitimize perpetual non-compliance. Public reporting is important, since publicizing compliance agreements may be a more powerful motivating tool for sewer users to improve their discharges than the actual terms of the agreements themselves.

**ALTERNATIVES FOR CONSIDERATION:**

Alternatives approaches were considered for each of the recommendations.

**Alternatives to Recommendation One – Removal of Phenolic Compounds from the List of Overstrength Parameters**

Regarding the recommendation to eliminate phenols from the list of parameters for which overstrength discharge agreements are allowed, two alternatives to the recommendation were considered, and recommended against.

**Alternative One**

One alternative available to the City of Hamilton is to leave the Sewer Use By-law unchanged and to continue to allow such agreements. By doing so, the City would be accepting a parameter for which there is no data to indicate that the City is in fact fully treating that parameter.

**Alternative Two**

Another alternative considered would be to conduct further studies to determine and establish concentration limits for the various types of phenolic compounds for both industrial discharges to the sewage collection system, and for the sewage treatment plant effluent. However, this alternative would require significant one-time and ongoing monitoring costs and would put further constraints on the operation of the City’s Woodward Avenue WWTP.

**Alternatives to Recommendation Two – Elimination of Hauled Waste from Outside the City’s Boundaries**

Regarding the recommendation to eliminate hauled wastes from outside of the City’s municipal boundaries, one alternative to the recommendation was considered.

**Alternative One**

One alternative available to the City of Hamilton is to leave the Sewer Use By-law unchanged and continue to allow the acceptance of hauled waste from outside of the City’s municipal boundaries. However, this could establish the City as the destination of choice for hauled waste from neighbouring municipalities, thus discouraging these municipalities from dealing with their own sewage treatment issues. It also could
continue to expose the City's wastewater treatment facilities to discharges that could upset the treatment process.

**Alternatives to Recommendation Three – Elimination of Acceptance of Hauled Waste of an Industrial Origin**

Regarding the recommendation to eliminate hauled wastes of an industrial origin, one alternative to the recommendation was considered.

**Alternative One**

One alternative available to the City of Hamilton is to leave the Sewer Use By-law unchanged and continue to allow the acceptance of hauled waste of an industrial origin. However, this would deprive the City’s Regulatory Services staff of a necessary legal tool in managing hauled sewage of an industrial origin, and could also continue to expose the City’s wastewater treatment facilities to discharges that could upset the treatment process.

**FINANCIAL/STAFFING/LEGAL IMPLICATIONS:**

**Financial/Staffing**

Improved mechanisms for control of discharges to the City's sewage collection system have the potential to reduce treatment plant process upsets, and the associated economic cost to operations budgets.

The recommended changes to the Sewer Use By-law, specifically the requirement to provide permits to industrial facilities with hauled waste, will create the need for additional wastewater sampling and laboratory analysis to be performed.

Based on the number of inspections currently undertaken by Compliance and Regulations staff, and the associated laboratory analyses, costs associated with sewer use inspection, sampling, and analyses should increase by approximately 10% above the current costs. This equates to an additional $40,000.

**Legal**

The proposed changes to the Sewer Use By-law identified in the recommendations to this Report will result in both a new permit system for haulers of industrial waste and associated fees and charges. Prior to the implementation of the By-law amendments to reflect such changes, public notice of such fees and charges will need to be given in accordance with the City's Public Notice Policy By-law.

**POLICIES AFFECTING PROPOSAL:**

**The Public Works Strategy Plan, Innovate Now**

The recommendations in this Report will assist in meeting the Public Works key goal to be recognized as the centre of environmental and innovative excellence in Canada. In addition, implementing the recommendations will also assist Public Works in building on our Strategic Vision Drivers as follows:

- **Communities (Services our communities connect with and trust) –**
Implementing the recommendations will allow for improvements to our local environment by allowing City staff to better control discharges to the sewage collection system and reduce potential impacts on wastewater treatment plant operations and final effluent quality.

A cleaner environment will result from this work through reduced water pollution, contributing to a healthier community, and a greater ability to make use of the waterfront and the Harbour as an area for recreation.

- **People (Skilled teams ready for any situation)** –
  This program demonstrates the ability of City staff to respond to an important and complex opportunity that affects our community. Implementing the proposed changes to the Sewer Use By-law requires the knowledge and skill of many staff that manage the collection system on a daily basis. Through an extensive consultation process stakeholders, including many employees, were invited to provide their input and contribute throughout the decision-making process. The proposed solution represents forward and innovative thinking that will highlight the City of Hamilton as a leader in protecting the environment.

- **Process (Smart processes to match our needs)** –
  Throughout the development process, plans have been formulated to ensure that all aspects of the Triple Bottom Line approach to problem solving are considered. Social, Environmental, and Economic impacts were all assessed to provide a balanced approach to the preferred alternative. A detailed analysis was employed in order to effectively arrive at the optimal solution which meets Hamilton-specific goals and objectives. The result is a sustainable long-term approach that addresses pressures from City growth, legislated requirements, and environmental protection.

- **Finances (Sound finance management for the long haul)** –
  The economic impact to the City was a significant factor in the decision-making process. Improved mechanisms for control of discharges to the City’s sewage collection system have the potential to reduce treatment plant process upsets, and the associated economic cost to operations budgets.

**RELEVANT CONSULTATION:**

In order to provide public comment on results of the above review, and specifically on the recommended changes to the existing Sewer Use By-law, two public information centres (PICs or open houses) were held to allow stakeholders to address City staff and the consultant, and to provide feedback. The open houses were held from 6:30 p.m. to 9:30 p.m. at the Hamilton Convention Centre and at the Sackville Hill Seniors Centre on March 11, 2008 and March 13, 2008 respectively.

The open houses were advertised in local newspapers and a public service announcement which was e-mailed to stakeholders. The stakeholders list included all waste haulers currently permitted by the City, all industries that are currently a party to an overstrength discharge and/or compliance agreement with the City, industries that currently have hauled waste brought to City facilities, local non-governmental environmental groups and relevant government agencies.
A total of 15 people signed the attendance sheet for the Hamilton Convention Centre PIC with an additional 14 signing at the Sackville Hill PIC. In addition to the comments received verbally at each of these meetings, a total of 16 attendees completed and handed in the comment sheets that were made available. Two additional comment sheets were received after the meetings by the March 28, 2008 deadline, with a further comment received by e-mail. Ten of the comments received were from business owners or representatives, five were from residents of Hamilton, two were from waste haulers, and one was from a government agency. The comments are summarized below.

Comments Regarding Overstrength Discharge Agreements for Phenols

Eleven of those who commented on this aspect of the proposed changes to the By-law agreed with the elimination of phenols as a parameter for which overstrength discharge agreements could be provided. Many suggested that the elimination of this parameter from overstrength discharge agreements was prudent and long overdue.

Five others disagreed with the proposal. Of the five who disagreed—four identified themselves as owners and/or representatives of businesses—several cited the cost impacts to industry of eliminating the overstrength discharge agreements for phenols. One suggested that limits for the more toxic phenolic species could be established and applied to industrial dischargers. Others suggested that sampling and analysis should be undertaken to determine the concentrations of these more-toxic phenol species in the City’s wastewater treatment plant outfalls. Several suggested that time would be necessary to comply with the change, and the proposed 6- to 12-month time frame to come into compliance with the 1 mg/L total phenolics limit would be insufficient.

Comments Regarding the Elimination of Hauled Waste from Outside of the City

The responses to the proposal to eliminate hauled waste from outside of the City were divided in much the same way as for the phenols proposal. Eleven of those who commented agreed with this proposal, while five disagreed. However, those who disagreed with this proposal were not generally the same respondents who disagreed with the proposal to eliminate phenols as an overstrength parameter. Indeed, four of the five respondents who disagreed with the proposal to eliminate hauled sewage from outside of the City agreed with the proposal to eliminate phenols as an overstrength parameter.

Of the five who disagreed with the proposal to eliminate the acceptance of hauled sewage from outside of the City, two identified themselves as waste haulers, and one was a generator of hauled waste from outside of the City who would be directly affected by such a change. Most of the dissenters cited the lack of suitable alternative disposal sites with some suggesting that alternative sites should be established in the neighbouring municipalities prior to the City of Hamilton proceeding with this proposal.

Comments Regarding the Proposal to Eliminate the Acceptance of Hauled Industrial Waste

Sixteen respondents commented on this proposal; ten were in favour while six did not agree with the proposal.
Of the six that did not agree with the proposal, one mentioned the issue of how domestic wastes generated at industrial facilities would be handled. Several of the attendees to the PICs also expressed concern regarding this issue, some saying that if there was a risk of losing their discharge privileges, they would be very hesitant to go onto any industrial facility, even to pick up loads of domestic waste (i.e. from toilets and showers). It is clear from these responses that considerable education efforts will have to be made regarding the changes in the By-law in this area prior to implementation, and that inspection and enforcement efforts will have to clearly identify which waste holding tanks have been pre-approved for discharge at the City’s facilities, and which ones are not allowed so that waste haulers feel comfortable accepting various hauled wastes from industrial facilities.

City Input

Input was received from the following City Departments/Divisions:

Public Works – Waste Management was consulted and confirmed that the landfill leachates generated by City operated landfills and currently discharged to the City’s Woodward Avenue WWTP would meet the By-law limits for total phenolic compounds, and thus would not be affected by the proposed elimination of this total phenolic compounds from the list of acceptable overstrength parameters.

Corporate Services - Legal Services and Budgets and Finance - The Report was reviewed and the comments received were incorporated into the Report.

Public Health Services - The Report was reviewed but no comments were provided.

CITY STRATEGIC COMMITMENT:

By evaluating the “Triple Bottom Line”, (community, environment, and economic implications) we can make choices that create value across all three bottom lines, moving us closer to our vision for a sustainable community, and Provincial interests.

Community Well-Being is enhanced. ☑ Yes ☐ No
The proposed recommendations allow the City to better control the discharge of phenolic compounds and other potentially hazardous materials in hauled industrial waste which contributes to better water quality for consumption and recreational purposes. The proposal to eliminate the acceptance of hauled waste generated from outside of the City ensures that the City’s facilities are used to serve the community.

Environmental Well-Being is enhanced. ☑ Yes ☐ No
The proposed recommendations enhance the City’s ability to monitor and control discharges to the wastewater treatment plant to help protect the receiving environment.

Economic Well-Being is enhanced. ☑ Yes ☐ No
The proposed recommendations help ensure discharges to the City of Hamilton’s sewer system do not cause costly plant upsets and reserve the City’s treatment facilities for use by the City’s own industrial and residential base.

Does the option you are recommending create value across all three bottom lines? ☑ Yes ☐ No
The option does create value across all three bottom lines as noted above.

Do the options you are recommending make Hamilton a City of choice for high performance public servants? ☑ Yes ☐ No
The option recommended does make Hamilton a City of choice for high performance public servants as City staff would be more effective in managing the allowable discharges to the City’s infrastructure and thus provide better protection for the wastewater treatment plants as well as the environment.
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Notes:
1. Specified as (4AAP)
2. Specified as Total phosphorus
3. Specified as animal/vegetable origin
4. Specified as total suspended solids

Sources:
1. CCME, 2007
2. Regional Municipality of Halton, 2002
3. Corporation of the City of Kingston, 2000
4. Corporation of the City of Toronto, 2000
5. MOE, 1998
6. Corporation of the City of Windsor, 1993
7. Regional Municipality of Waterloo, 1992

* From SEWER USE BY-LAW REVIEW – OVERSTRENGTH PARAMETERS AND LABORATORY METHOD, CITY OF HAMILTON, HAMILTON, ONTARIO, CONESTOGA-ROVERS ASSOCIATES, MARCH 2008