

Ministry of the Environment, Conservation and Parks

Consolidated Linear Infrastructure Environmental Compliance Approvals

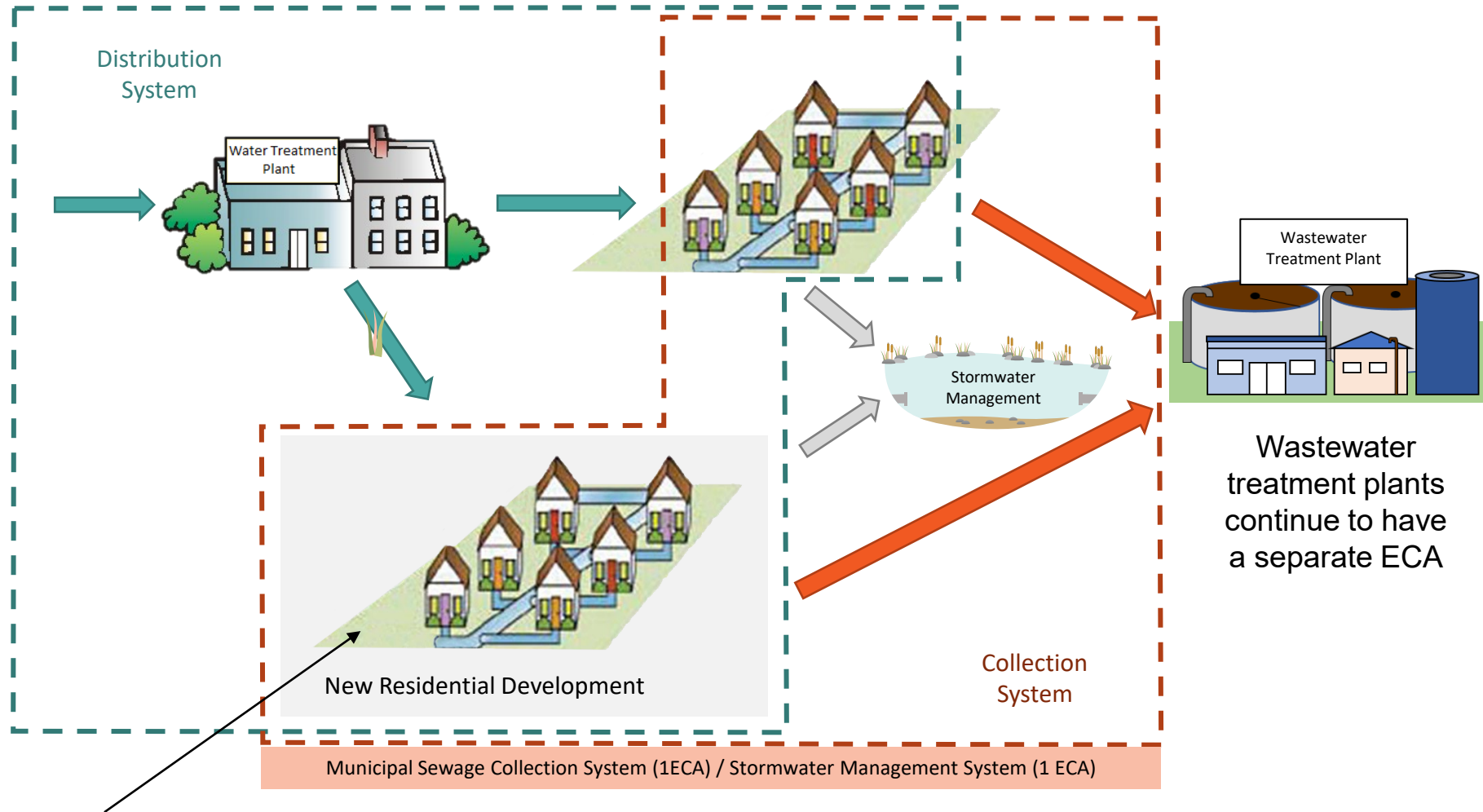
2024 DWQMS Workshops

April 2024

CLI ECA Overview

- Consolidated Linear Infrastructure Environmental Compliance Approvals (CLI-ECA) are replacing existing pipe-by-pipe approvals for some municipal sewage works by consolidating approvals for linear infrastructure into a system-wide permission with modern terms and conditions.
- Each owner (municipality) will receive:
 - One CLI-ECA for their Municipal Sewage Collection System
 - One CLI-ECA for their Municipal Stormwater Management System
- Industrial, commercial, and wastewater treatment facilities will still require a separate sewage ECA.

Consolidated Linear Infrastructure Permissions Approach



E.g., similar scope of pre-authorization for extension to new residential developments in three permissions: drinking water, sanitary sewage collection and stormwater management.

Relationship to Drinking Water Permissions and the Drinking Water Quality Management Standard

Scope of Approval and Conditions

- System wide approvals that include pre-authorization
- Mirrors approach for Schedule C alterations, Director Notifications and record keeping forms.

Similar or Related Projects

- Similar scope of pre-authorization, allowing extension of systems to new residential developments
- Intended to allow drinking water distribution, sanitary sewers and storm sewers to proceed on similar timelines, using similar processes.

Same Municipal Role

- Municipal responsibility for the overall system
- Authorization provided to alter / extend system through project approvals.
- Similar verification requirements with similar forms and record keeping requirements.

The CLI Approach is....



Improving Consistency and Environmental Protection

- Standard conditions across Ontario for system design, construction and operation
- Updated ECA terms and conditions and Design Criteria will enhance environmental protection



Streamlining the Approvals Process

- For both municipalities, and developers constructing works on behalf of municipalities
- Pre-authorization conditions for routine activities prevent need for an ECA application where alterations meet the Design Criteria and conditions in the CLI-ECA



Creating a Holistic Picture of Sewage Works

- Will enable enhanced policy and decision making
- Process to update the ECA description as projects are completed
- Renewed ~5 years to ensure the conditions and the description of sewage works remains up to date

Consolidated Linear Infrastructure Permissions

Three Key Components

New ECA Templates

- Introduce a standard format and standardized operating and reporting conditions
- Include new preauthorization conditions, including documentation requirements

New Design Criteria

- When followed, enables alteration to the works without a separate approval
- Sanitary sewers, forcemains, storm pipes
- Includes clear design specifications, including post installation checks

Prescribed Persons Regulation O. Reg. 208/19

- Enables developers to alter or extend a municipality's sewage system without a separate approval, if the works will be transferred to municipal ownership under a development agreement

Changes in Municipal Role

Accountability & Oversight

- No change to existing requirements under other legislation such as the Planning Act.
- Pre-authorization is limited to works that will become part of the municipally owned system.
- Work may be undertaken by another party on behalf of the municipality (i.e., a “Prescribed Person” such as a developer)
- Municipality must agree to (approve) any changes to their system and must maintain records to ensure conditions of pre-authorization have been followed.

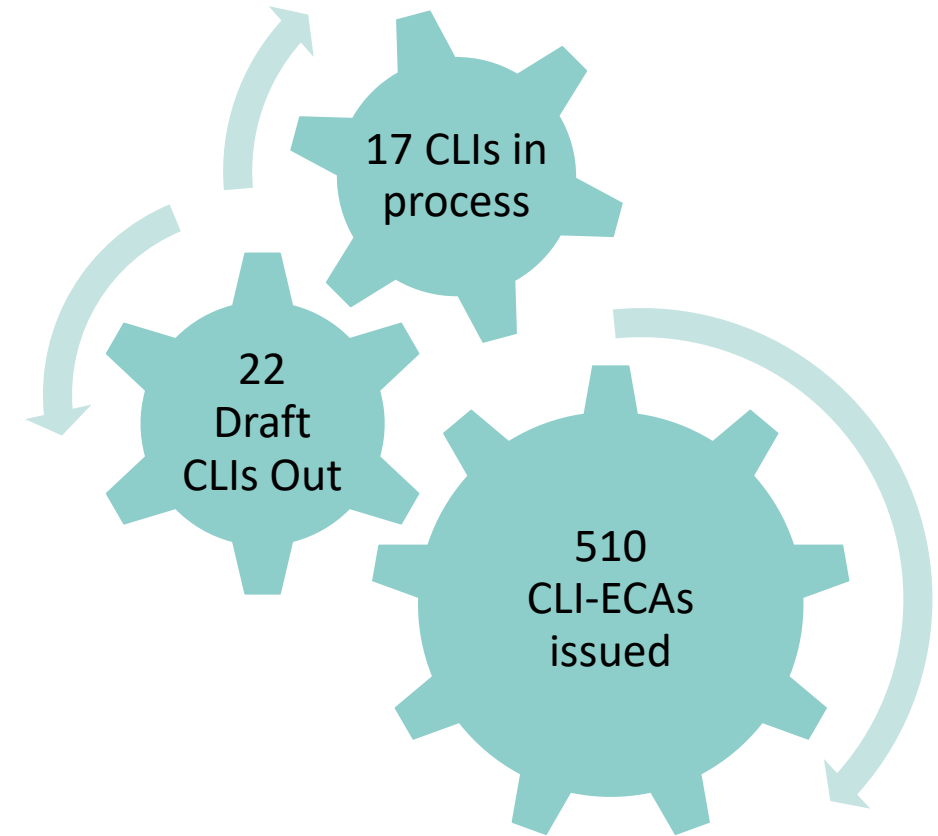
Operation & Maintenance

- Enhanced requirements for monitoring system operation, inspecting and maintaining infrastructure in the system and reporting overflows / spills.

Current Status

as of March 25, 2024

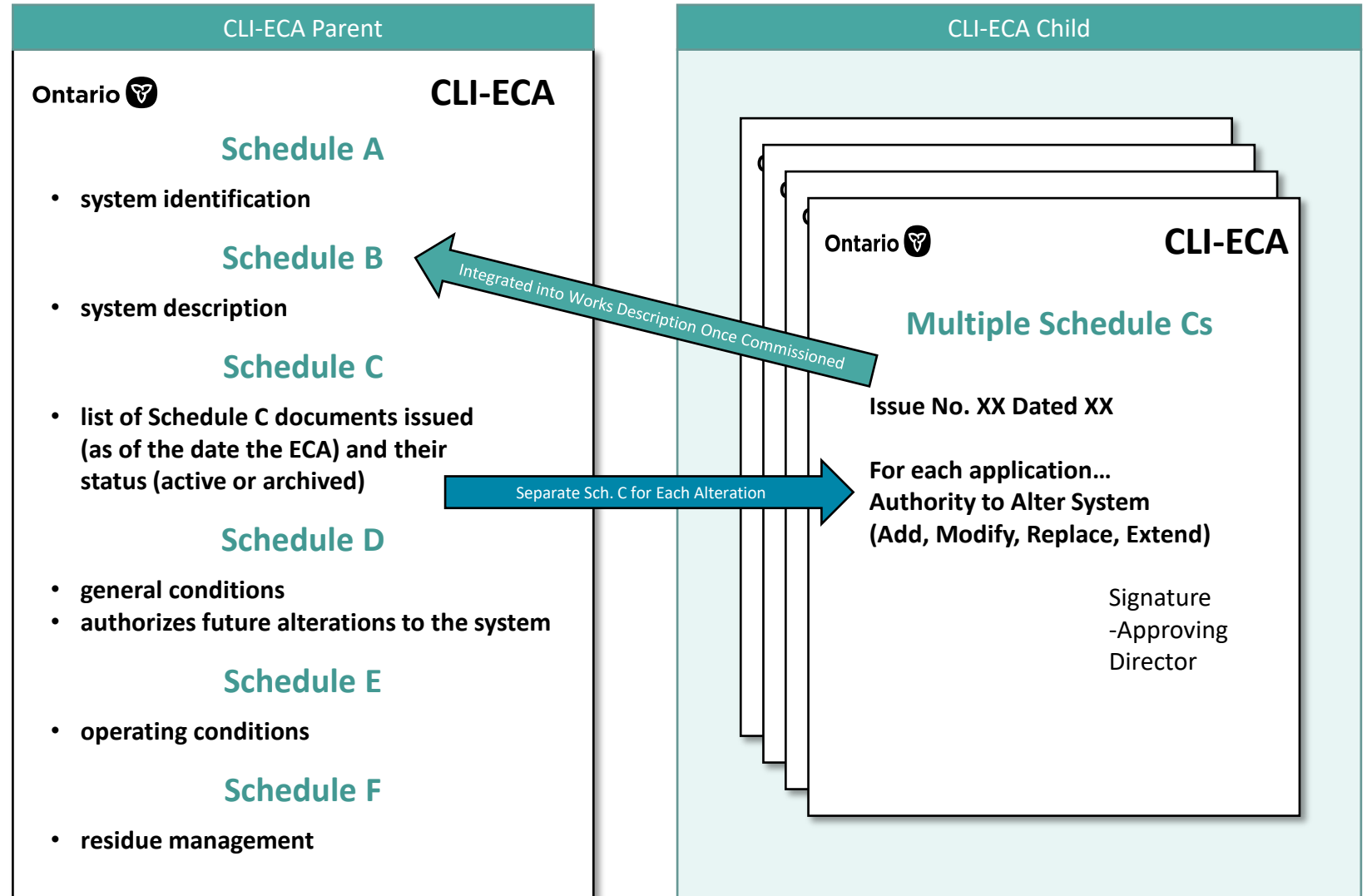
- CLI applications are being prioritized
- General information is available on Ontario.ca
- Design Criteria
 - Current version: 2.0, dated May 31, 2023.
- Stormwater Monitoring Guidance
 - Guidance is being drafted and will be posted on the Environmental Registry for consultation prior to being finalized.




Consolidated Linear Infrastructure

Templates, Structure & Framework

ECA Templates



CLI-ECA Parent

Ontario  **CLI-ECA**

Schedule A

- system identification

Schedule B

- system description

Schedule C

- list of Schedule C documents issued (as of the date the ECA) and their status (active or archived)

Schedule D

- general conditions
- authorizes future alterations to the system

Schedule E

- operating conditions

Schedule F

- residue management



**ENVIRONMENTAL COMPLIANCE APPROVAL
For a Municipal Sewage Collection System**

**ECA Number: 0X0-W601
Issue Number: 1**

Pursuant to the *Environmental Protection Act*, R.S.O 1990, c. E. 19 (EPA), and the regulations made thereunder and subject to the limitations thereof, this environmental compliance approval is issued under section 20.3 of Part II.1 of the EPA to:

#{OWNERNAME}
 {Address Line 1}
 {Address Line 2}

For the following Sewage Works:

#{SYSTEMNAME}

This Environmental Compliance Approval (ECA) includes the following:

Schedule	Description
Schedule A	System Information
Schedule B	Municipal Sewage Collection System Description
Schedule C	List of Notices of Amendment to this ECA: Additional Approved Works
Schedule D	General
Schedule E	Operating Conditions
Schedule F	Residue Management


All prior ECAs, or portions thereof, issued by the Director for Sewage Works described in section 1 of Schedule B [are](#) revoked and replaced by this Approval.

DATED at TORONTO this #{DAY} day of #{MONTH}, #{YEAR}

Signature
 #{CURRENTUSER}, P.Eng.
 Director, Part II.1, *Environmental Protection Act*



CLI-ECA Parent

Ontario 
CLI-ECA

Schedule A

- system identification

Schedule B

- system description

Schedule C

- list of Schedule C documents issued (as of the date the ECA) and their status (active or archived)

Schedule D

- general conditions
- authorizes future alterations to the system

Schedule E

- operating conditions

Schedule F

- residue management

Schedule A: System Information

System Owner	#{OWNERNAME}
ECA Number	#{ECANO}
System Name	#{SYSTEMNAME}
ECA Issue Date	#{MONTH} #{DAY}, #{YEAR}

1.0 ECA Information and Mandatory Review Date

ECA Issue Date	#{MONTH} #{DAY}, #{YEAR}
Application for ECA Review Due Date	#{APPRENEWAL}

1.1 Pursuant to section 20.12 of the EPA, the Owner shall submit an application for review of the Approval no later than the Application for ECA Review Date indicated above.

2.0 Related Documents

2.1 STPs, Satellite Treatment Facilities, and Pumping Stations connected to the Authorized System that are not part of the Authorized System:

System/Facility Name	Wastewater System Number	Location	ECA Number	Issue Date
#{SYSTEMNAME}			[ECA #]	[issue date]

2.2 Other Documents

Document Title	Version
Design Criteria for Sanitary Sewers, Storm Sewers and Forcemains for future Alterations Authorized under ECA	v.X. <DATE>

3.0 Asset Management Plan

Document Title	Version
Placeholder for reference to the Asset Management Plan	v.X. <DATE>

4.0 Pollution Prevention and Control Plan (if applicable)

Document Title	Version
Placeholder for reference to the Pollution Prevention and Control Plan	v.X. <DATE>

Schedule A

- system identification

Schedule B

- system description

Schedule C

- list of Schedule C documents issued (as of the date the ECA) and their status (active or archived)

Schedule D

- general conditions
- authorizes future alterations to the system

Schedule E

- operating conditions

Schedule F

- residue management

Schedule B: Municipal Sewage Collection System Description

System Owner	#{OWNERNAME}
ECA Number	#{ECANO}
System Name	#{SYSTEMNAME}
ECA Issue Date	#{MONTH} #{DAY}, #{YEAR}

1.0 System Description

1.1 The following is a summary description of the Sewage Works comprising the Municipal Sewage Collection System:

Overview

The #{SYSTEMNAME} consists of Sewage Works for the collection and transmission of Sewage, consisting of trunk Sewers, Sewers, [X] kilometers of Combined Sewers, Sewage pumping stations, wet-weather interceptor tanks, forcemains, small bore systems, with discharge into ____, ____, and ____ STP.

Sewage Collection System

1.2 The Authorized System comprises:

1.2.1 The Sewage Works described and depicted in each document or file identified in column 1 of Table B1.

Column 1 Document or File Name	Column 2 Date
[Asset ID/Name]	[DATE]

1.2.2 Sewers, forcemains, pumping stations and other Sewage Works that have been added, modified, replaced, or extended through authorization provided in a Schedule C Notice respecting this Approval, where Completion occurs on or after the date identified in column 2 of Table B1 for each document or file identified in column 1.

1.2.3 Sewers, forcemains, pumping stations and other Sewage Works that have been added, modified, replaced, or extended through authorization provided in Schedule D of this Approval, where Completion occurs on or after the date identified in column 2 of Table B1 for each document or file identified in column 1.

Schedule A

- system identification

Schedule B

- system description

Schedule C

- list of Schedule C documents issued (as of the date the ECA) and their status (active or archived)

Schedule D

- general conditions
- authorizes future alterations to the system

Schedule E

- operating conditions

Schedule F

- residue management

**Schedule C: List of Notices of Amendment to this ECA:
Additional Approved Sewage Works**

System Owner	#{OWNERNAME}
ECA Number	#{ECANO}
System Name	#{SYSTEMNAME}
ECA Issue Date	#{MONTH} #{DAY}, #{YEAR}

1.0 General

1.1 Table C1 provides a list of all notices of amendment to this Approval that have been issued pursuant to clause 20.3(1) of the EPA that impose terms and conditions in respect of the Authorized System after consideration of an application by the Director (Schedule C Notices).

Table C1: Schedule C Notices				
Column 1 Issue #	Column 2 Issue Date	Column 3 Description	Column 4 Status	Column 5 DN#
Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable

Schedule A

- system identification

Schedule B

- system description

Schedule C

- list of Schedule C documents issued (as of the date the ECA) and their status (active or archived)

Schedule D

- general conditions
- authorizes future alterations to the system

Schedule E

- operating conditions

Schedule F

- residue management

Schedule D: General

System Owner	\${OWNERNAME}
ECA Number	\${ECANO}
System Name	\${SYSTEMNAME}
ECA Issue Date	\${MONTH} \${DAY}, \${YEAR}

1.0 Definitions

1.1 For the purpose of this Approval, the following definitions apply:

“Adverse Effect(s)” has the same meaning as defined in section 1 of the EPA.

“Alteration(s)” includes the following, in respect of the Authorized System, but does not include repairs to the system:

- a) An extension of the system,
- b) A replacement or retirement of part of the system, or
- c) A modification of, addition to, or enlargement of the system.

“Approval” means this Environmental Compliance Approval including any Schedules attached to it.

“Appurtenance(s)” has the same meaning as defined in O. Reg. 525/98 (Approval Exemptions) made under the OWRA.

“Authorized System” means the Sewage Works comprising the Municipal Sewage Collection System authorized under this Approval”.

“Average Year” means the long term average of flow based on:

- a) Simulation of at least twenty years of rainfall data;
- b) A year in which the rainfall pattern (e.g., intensity, volume, and frequency) is consistent with the long-term mean of the area;
- c) A year in which the runoff pattern resulting from the rainfall (e.g., rate, volume, and frequency) is consistent with the long-term mean of the area; or
- d) Any combination of a), b) and c).

Schedule A

- system identification

Schedule B

- system description

Schedule C

- list of Schedule C documents issued (as of the date the ECA) and their status (active or archived)

Schedule D

- general conditions
- authorizes future alterations to the system

Schedule E

- operating conditions

Schedule F

- residue management

Schedule E: Operating Conditions

System Owner	#{OWNERNAME}
ECA Number	#{ECANO}
System Name	#{SYSTEMNAME}
ECA Issue Date	#{MONTH} #{DAY}, #{YEAR}

1.0 General Operations

- 1.1 The Owner shall ensure that, at all times, the Sewage Works comprising the Authorized System and the related Equipment and Appurtenances used to achieve compliance with this Approval are properly operated and maintained.
- 1.2 Prescribed Persons and Operating Authorities shall ensure that, at all times, the Sewage Works under their care and control and the related Equipment and Appurtenances used to achieve compliance with this Approval are properly operated and maintained.
- 1.3 In conditions 1.1 and 1.2 "properly operated and maintained" includes effective performance, adequate funding, adequate operator staffing and training, including training in applicable procedures and other requirements of this Approval and the EPA, OWRA, CWA, and regulations, adequate laboratory services, process controls and alarms and the use of process chemicals and other substances used in the Authorized System.

2.0 Duties of Owners and Operating Authorities

- 2.1 The Owner, Prescribed Persons and any Operating Authority shall ensure the following:
 - 2.1.1 At all times that the Sewage Works within the Authorized System are in service the Sewage Works are:
 - a) Operated in accordance with the requirements under the EPA and OWRA, and
 - b) Maintained in a state of good repair.
 - 2.1.2 The Authorized System is operated by persons having the training or expertise for their operating functions that is required by O. Reg. 129/04 (Licensing of Sewage Works Operators) under the OWRA and this Approval.

Schedule A

- system identification

Schedule B

- system description

Schedule C

- list of Schedule C documents issued (as of the date the ECA) and their status (active or archived)

Schedule D

- general conditions
- authorizes future alterations to the system

Schedule E

- operating conditions

Schedule F

- residue management

Schedule F: Residue Management

System Owner	#{OWNERNAME}
ECA Number	#{ECANO}
System Name	#{SYSTEMNAME}
ECA Issue Date	#{MONTH} #{DAY}, #{YEAR}

1.0 Residue Management System

1.1 The following [types of system / Facility] are considered part of the Municipal Sewage Collection System described in this Approval:

Placeholder Item 1

Location	
Longitude/Latitude Coordinates	
Description	

Placeholder Item 2

Location	
Longitude/Latitude Coordinates	
Description	

2.0 Applicable Residue Activities

2.1 The following residue activities have been authorized:

2.1.1 Placeholder

3.0 Terms & Conditions

3.1 The operation of the residue management systems described in condition (above) are subject to the following conditions:

3.1.1 Placeholder

Consolidated Linear Infrastructure

Alterations & Pre-Authorization

Preauthorization

Allow simple, routine changes to be made with no additional approval from the Ministry, such as:

- Modifying, replacing or extending sanitary sewers and storm sewers, including extensions into new residential developments;
- Adding new sewage pumping stations or modifying existing sewage pumping stations;
- Adding new stormwater management facilities or modifying existing facilities (e.g., wet pond, infiltration basins, engineer wetlands, etc.)
- Adding new or modifying existing equipment with emissions to air (e.g., emergency power generators or venting for odour control).

All pre-authorized alterations are subject to strict conditions that ensure environmental protection. Changes that do not meet the conditions will require a separate application from the Ministry and must be approved before they proceed.

Preauthorization

Stormwater Management Activities

- Additions, Modifications, Replacement and Extensions of:
- *Storm sewer, ditch or culvert within the municipal SWM system*
- SWM Facilities such as: Dry ponds, wet ponds, infiltration trenches, Oil Grit Separators, LID facilities
- Third Pipe Collection Systems

Sanitary Collection System Activities

- Construction of separated/nominally separated sewers, and forcemains
- Upgrades to combined or partially separated sewers, combined sewage storage tanks and structures
- New pumping stations (designed to meet specific conditions)
- Alterations to real-time control systems, collection system storage, existing pumping stations and odour control units

Preauthorization

Examples - Activities that are NOT Preauthorized:

- Alterations resulting in a discharge to the environment (new collection system overflow points)
- Alterations involving partial treatment of sewage
- Anything that doesn't meet the requirements for preauthorization

Alterations that do not meet the conditions in Schedule D require an application to the ministry.

Repairs, plumbing and works exempt under O. Reg. 525/98 are not an Alteration do not require approval.

Director Notifications

- Notification of changes to the ECA description following alterations (via preauthorization or Schedule C approval)
- Additional fields to create a streamlined process to enable the administrative updates to the ECA where additional works are discovered, or assumed by the municipality, or for works that were not completed at the time the CLI-ECA was issued (i.e. anything not included with initial application)
- Also allows for general administrative changes or corrections to the description in Schedule B of the ECA.

<input type="checkbox"/> C.	An ECA issued prior to the date of issue of the first consolidated ECA respecting works which were not in service at the time of issuance of the consolidated ECA	
	ECA Number	ECA Issue Date (YYYY/MM/DD)
<input type="checkbox"/> D.	Other works assumed by the owner <u>as a result of</u> another agreement	
<input type="checkbox"/> E.	Discovery of existing works not previously documented in Schedule B of the ECA	
<input type="checkbox"/> F.	Changes made to the description of existing works in Schedule B of the ECA	

Other Updates to Your CLI ECA

Is it a result of an Alteration?

- Pre-authorized in CLI-ECA
- Approved through another ECA

} Director Notification

Is it new / updated information?

- Change of volume / flows
- Updated description of works

} Director Notification

Is it linked to your initial CLI-ECA?

- Spelling mistake / formatting issue
- Missed edit in draft

} Email*

*Email your reviewer and copy Christopher.Manning@ontario.ca

Technical Amendments (Schedule C)

- Follow the standard (traditional) ECA application process
<https://www.ontario.ca/page/environmental-compliance-approval>
- Use the standard ECA application form
- Include the required technical supporting information / application fee
- Pre-application consultation is encouraged for complex projects

Key difference: approval will be granted as an amendment to the CLI-ECA (a CLI-ECA Schedule C) as opposed to a separate, stand-alone ECA.

Applications submitted for works that are preauthorized will be turned back with guidance these can already proceed under the conditions of the CLI-ECA

Consolidated Linear Infrastructure

Transition Considerations

Implementation Timeframes

Multiple Conditions Include Implementation Dates / Timelines, including:

- Operations & maintenance manual
- Annual reports
- Signage for outlets / stormwater management facilities
- Source water protection
- Storm sewer catchment asset inventory
- Sanitary / combined collection system overflow sampling
- Assessment of system operations (e.g., wet weather / dry weather flows, conformance to procedure F-5-1 and F-5-5).
- Creation or update of sewer model

Flexibility on timelines may be available based on case-specific circumstances. Note these when reviewing your draft. If you've received your CLI-ECA, reach out to discuss.

Transitional Considerations

Transition for Projects underway: Schedule D, Condition 9

May proceed under preauthorization without meeting the Design Criteria if:

- Design was completed before the CLI-ECA was issued or a Class EA was completed and changes to the design would result in significant cost increases or significant project delays.
- Effort to undertake the alteration takes place on or before a specified date (approximately 12 months from the date the CLI-ECA is issued)
- Design conforms to existing guidelines / requirements (e.g., Design Guideline for Sewage Works, Stormwater Management Planning and Design Manual)
- Other than the Design Criteria, the project otherwise meets all the requirements / conditions for pre-authorization.

Developer Operated Facilities (Stormwater)

Schedule B, Table B7 & B8

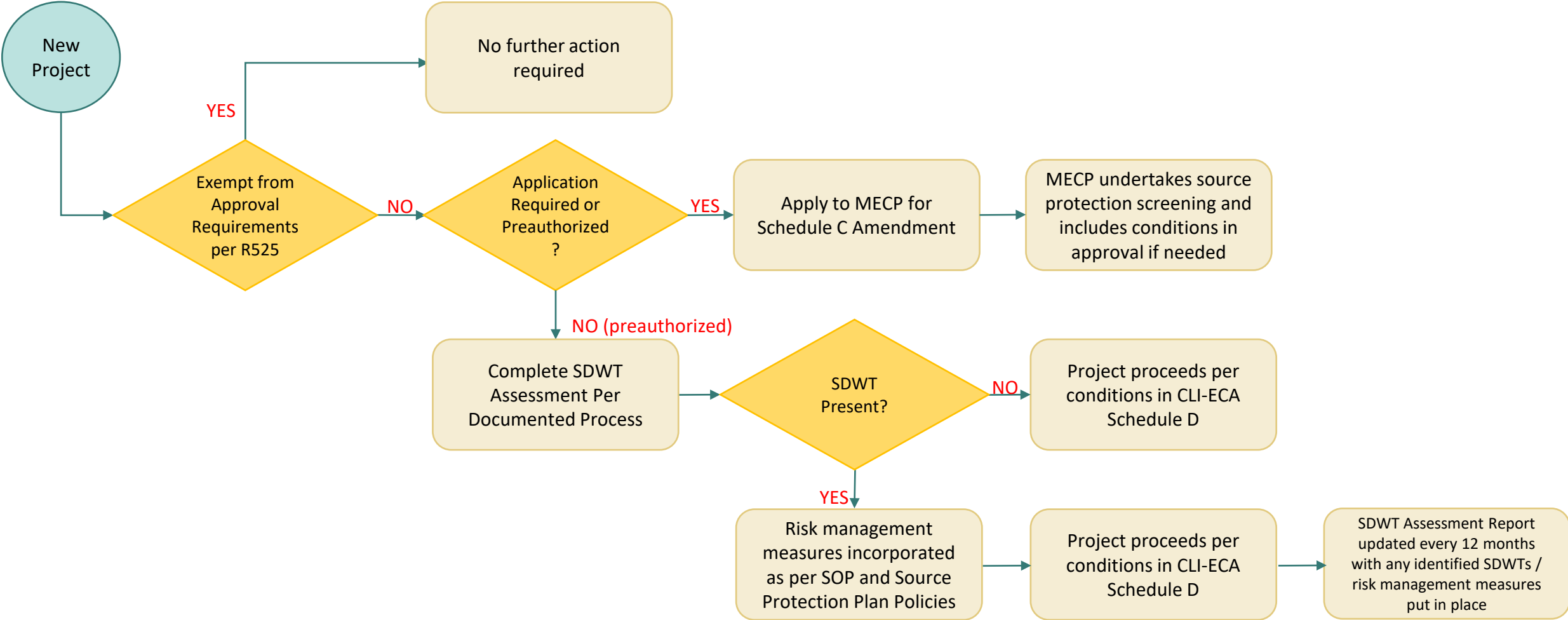
Existing facilities with individual ECAs

- ECAs issued to developers for things like stormwater ponds will not be immediately revoked and replaced by the CLI-ECA.
- These facilities will be listed in Table B8, and incorporated into the CLI-ECA over time as they are assumed by the municipality.

Facilities constructed after the CLI-ECA issued

- Will be part of the system if constructed as a pre-authorized alteration or based on a ministry approval (Schedule C).
- Will be listed in Table B7 while they are developer-operated (developer will not be specifically listed as an operating authority, but will be identified in this table).

CLI – SDWT Assessment Process



Approval Requirements – Exceptions/Exemptions

Work meeting exceptions in [OWRA 53\(6\)](#), or the exemptions in [O. Reg. 525/98](#) is **not subject** to approval requirements (i.e. preauthorization record keeping form documentation process).

- 53(6) includes exception for “*routine maintenance*” to sewage works
- O. Reg. 525 exemption examples for sewers:
 - change in service connection,
 - alterations to *appurtenances* (valve, valve chamber, flow meter, maintenance access point, maintenance hole, manhole, grate, catch basin, catch basin lead, ditch inlet chamber or other minor accessory part of a sewer),
 - relining activities,
 - like-for-like replacements

**Exemptions above are examples. Consult the sections of the Act/regulation for a full-list of exemptions and associated conditions*

Approval Requirements – Exceptions/Exemptions

Maintenance: Work done proactively to keep components in a fit state of repair with the intent to maintain the same state that existed previously.

Repair: Work done to fix an issue (during a breakdown or emergency) with the intent to maintain the same state that existed previously

- Both maintenance and repair could involve “*replacements*” but the intent of each is different (maintenance is more proactive, while repair can be more reactive if completed following a break).
- Both are *exempt* as long as the intent is to maintain the same state.

Alteration: Where the intent is to alter the previous state of the works, e.g. replacement of pipe with larger diameter pipe with the intention is to increase service area. Alterations are preauthorized if they meet the conditions outlined in CLI-ECA Schedule D or DWWP Schedule B.

Preauthorization of Underground Stormwater Tanks

- Schedule D of the SWM CLI ECA includes a list stormwater works that can be pre-authorized if the works comply with all of the pre-authorized conditions, and includes:
 - **LID** that relies on one or more of the following mechanisms to achieve treatment and control:
 - a) Evapotranspiration;
 - b) Infiltration into the ground; or
 - c) Filtration
- Underground SWM tanks (such as underground infiltration tanks) that use at least one of *evapotranspiration, infiltration into the ground, or filtration*, can be preauthorized as an LID, if all other pre-authorization requirements are met
- Underground tanks used only for *detention and sedimentation*, are not currently listed in the SWM CLI ECA
- Schedule D allows the Director to authorize additional types of SWM facilities on a case-by-case basis. Requests to add a type of facility the list can be submitted as an administrative amendment application to ECA.Submission@Ontario.ca for consideration.

CLI-ECA Schedule F: Residue Management

- May include system specific conditions relating to residue management.
 - E.g., alternative soil management requirements for storm pond sediment, or additional scope for beneficial re-use beyond those currently allowed by regulation
- MECP Excess Soils Workshop
 - Provided clarification on excess soils requirements and when they apply
 - Key CLI takeaway that CLI-ECA Schedule F can be used to **authorize in-situ sampling for stormwater pond sediment and other types of beneficial reuse not already authorized.**
 - To amend Schedule F to include conditions for in-situ sampling, an administrative amendment application can be submitted to ECA.Submission@Ontario.ca

Excess Soils

Property Use Classification For Collection/Distribution System Infrastructure

- Additional requirements triggered under the *Excess Soils Regulation* (O. Reg. 406/19), for properties with an industrial use (considered “Enhanced Investigation Project Areas”).
- Following its Excess Soils Workshop, MECP provided interpretation that sewage and water pumping stations are part of the water and wastewater **distribution and collection systems** unless directly associated with the treatment facility, and as such **are not considered industrial facilities**.
- Collection and distribution systems are largely associated with another type of property use, which would be the use that defines the property type, e.g., collection or distribution pipes under a road would be part of a road property use, which is a community property use.
- The regulation is not specific for collection/distribution system components located on a standalone property not associated with another type of property use (which may apply to pumping stations). Standalone pumping station properties may be considered similar to road corridors, which would be community use.
- Where considered a community use, excavations at pumping stations in a settlement area generating 2000m³ or more of excess soil would trigger the reuse planning requirements under O. Reg. 406/19 unless an exemption applies.

Excess Soils

Property Use Classification For Collection/Distribution System Infrastructure

The following definitions from O. Reg. 153/04 (Record of Site Condition Regulation), the Ontario Water Resources Act and O. Reg. 170/03 (Safe Drinking Water Act) provide further explanation:

- “industrial use” under O. Reg. 153/04 includes use in connection with:
 - large septic systems (subsection 53 (6.1) of the OWRA)
 - a water *treatment facility*
 - a sewage *treatment facility*
- “**Sewage treatment facility**” means that part of a sewage works as defined in the OWRA that treats or disposes of sewage but does not include the part of the sewage works that collects or transmits sewage
- “**Water treatment facility**” for large/small municipal residential drinking water systems as defined in O. Reg. 170/03, SDWA, is a facility that is used in relation to the treatment of water and includes any equipment related to the management of residue from the treatment process or the management of a substance into the
- Both definitions of “facility” relate to treatment and **not** collection or distribution
 - Top-up chlorination that may be associated with a reservoir is also considered part of the distribution system

Is an application for a CLI ECA *required*?

- An ECA is required under Section 53 of the OWRA to “**use, operate**, establish, alter, extend or replace new or existing sewage works”. It is likely that your municipality may be using or operating existing infrastructure, such as works constructed prior to approval requirements, that does not have an ECA in contravention of s.53(1) of the Ontario Water Resources Act (OWRA).
- The CLI-ECA provides you with an opportunity to address these gaps without applying for individual ECAs for these historic works. There is an expectation that all municipalities will apply for a CLI-ECA.
- The ministry has created an **administrative** process that allows a municipality to capture all existing works under an approval without any additional technical review.

It's taking a lot of time / effort to pull together detailed information for all our linear infrastructure works.

Can I have more time to prepare this information?

- Our focus is on collecting an accurate description of the works, based on the information that you currently have available. If there are known gaps in the information, please identify those gaps and submit anyway. So long as the components of your system are accurately described, we can work with you to obtain any additional details necessary for your first CLI-ECA.
- There will be a streamlined process for you to submit information after you have received an CLI-ECA. Incomplete information should not be a barrier to you submitting an application.

Does everything need to be designed by a Licensed Engineering Practitioner?

- Where the CLI-ECA states “be prepared by a Licensed Engineering Practitioner” it is only intended to mean where the works fall within the scope of engineering practice for the purposes of the Professional Engineers Act.
- Conditions in the CLI-ECA will be updated to more clearly reflect this in future.

Is the municipality responsible for works constructed by a developer under the CLI-ECA?

- A CLI-ECA is issued to a municipality and intended to cover all their sewage works (sanitary sewage or stormwater), including works added, extended or altered by a prescribed person (i.e., developer).
- The overall responsibility for works constructed under the authority of a CLI-ECA lies with the municipality and as the owner of the works, the municipality must sign-off on several items in part 4 for the appropriate record keeping forms.
- It is advisable to review and consider updates to existing processes and/or standard language in your development agreements to ensure works are constructed, operated and maintained in accordance with the CLI-ECA.

How does CLI change the process for consultants that may undertake projects on behalf of a municipality or developer?

- If the project is not municipal (i.e., the works will not be assumed by a municipality), **there is no change.**
- If the project related to a sewage treatment plant, **there is no change.**

Key Items to consider:

- Pre-authorized alterations are listed in the municipalities CLI-ECA. Obtain a copy early in the project to determine if it will be pre-authorized. No additional approval is required for pre-authorized alterations.
- If the project does not meet pre-authorization conditions, an application to the Ministry is required (**no change to existing technical requirements**)

What is the difference between an assessment of wet weather / dry weather flows and an assessment to F-5-1 / F-5-5

Assessment of Wet Weather Flows Compared to Dry Weather Flows

- Required if there are **NO** combines sewers / partially separated sewers; **and**
- There has been one or more STP overflow, STP bypass or collection system overflow in the 10 year period listed in the CLI ECA
- Some exceptions (i.e., if all overflow / bypass attributed to power outage or equipment failure)

Assessment of Wet Weather Flows Compared to Dry Weather Flows

- Required if there **ARE** combines sewers / partially separated sewers; **and**
- There has been one or more STP overflow, STP bypass or collection system overflow in the 10 year period listed in the CLI ECA

What is required in an assessment of wet weather / dry weather flows

Intended as a review of **available** data to understand:

- Where system sewage is discharging to the environment
- If any action(s) can be taken to decrease discharge frequency / volume

A review of the wet weather flows to dry weather flows will usually locate areas with inflow and infiltration issues.

What is required in an assessment of conformance to Procedure F-5-1 and F-5-5

A review by a licenced engineering practitioner that:

- Evaluates and characterizes overflows (i.e., those occurring outside of significant storm events).
- Considers the existing Pollution Prevention and Control Plan (if any)
- Identifies actions taken to prevent overflows and timelines for achieving conformance to procedures F-5-1 and F-5-5, as applicable.

Information from the assessment should be used to develop or update the Pollution Prevention and Control Plan.

What is required in a new or updated sewer model?

- Sewer models are required to facilitate pre-authorization to ensure adequate capacity before extending / altering a system.
- No fixed format, complexity likely to vary based on the nature / size / complexity of the system.

Only required if

- System has combined sewers OR
- System services a population of greater than 10,000.

What is required in an annual performance report?

Annual report that covers Jan 1st to Dec 31st and provides an overall summary of system performance including a summary of:

- Required monitoring, with a conclusion drawn from the data (i.e., does it show that things are operating as designed, or that future alterations or maintenance is required?)
- Problems that occurred in the system (if any), and corrective actions taken
- Calibration, maintenance and repairs on major structures and equipment
- Complaints (if any) and actions taken to address them
- Alterations to the system
- Spills (if any) and any actions taken to reduce spills / overflows / bypasses

[Submit to ECA.Submission@ontario.ca](mailto:ECA.Submission@ontario.ca)

What is required in an O&M Manual?

Procedures for:

- Routine operation
- Routine inspection and checks of controlling systems
- Preventing odours and odour impacts
- Calibration of monitoring equipment
- Receiving, responding and recording complaints / follow up actions

Details regarding:

- Inspection programs (i.e., frequency, methods)
- Maintenance and repair programs (i.e., frequency, clean-out requirements for storage or overflow tanks)
- Operation and maintenance requirements for source protection
- Emergency response, spill reporting and contingency plans and procedures
- As build drawings

Upcoming Workshops & Presentations

Consolidated Linear Infrastructure Implementation Seminar

May 22, 2024 (online) **May 29, 2024** (in person)

The ministry will be hosting a half-day seminar for municipalities, operating authorities and consultants on subjects related to consolidated linear infrastructure environmental compliance approvals (CLI ECAs) including: pre-authorized alterations, operations and maintenance manuals, annual reporting, wet weather vs dry weather assessments, and assessments of conformance to Procedure F-5-1 / F-5-5.

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*Thank
You!*