

Operation of Recreational Vehicle Dump Sites at Wastewater Treatment Facilities

Presented To:	Operations Committee
Meeting Date:	September 20, 2021
Туре:	Referred & Deferred Matters
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Recommended by:	General Manager of Growth and Infrastucture

Report Summary

This report provides a recommendation regarding the Recreational Vehicle (RV) dump sites at the Sudbury, Valley East and Chelmsford Wastewater Treatment Plants based on updated operational and safety assessments.

Resolution

THAT the City of Greater Sudbury approves:

- 1) the closure of the recreational vehicle dump sites at the Valley East and Chelmsford Wastewater Treatment Plants due to safety and operational concerns, and;
- the installation of an automated payment system and required accessibility modifications at the Sudbury Wastewater Treatment Plant at an estimated installation cost of \$13,184 with annual operating costs of approximately \$46,812 per year to be funded from Wastewater operating funds;

as outlined in the report entitled "Operation of Recreational Vehicle Dump Sites at Wastewater Treatment Facilities", from the General Manager of Growth & Infrastructure, presented at the Operations Committee meeting on September 20, 2021;

AND THAT the City of Greater Sudbury directs staff to prepare a business case to determine an appropriate user fee to achieve full cost recovery for inclusion in the 2022 budget.

Relationship to the Strategic Plan, Health Impact Assessment and Community Energy & Emissions Plan (CEEP)

This report refers to operational matters and has no direct connection to the Community Energy & Emissions Plan or the Strategic Plan.

Financial Implications

The current unbudgeted operating costs for the CGS Recreational Vehicle Dump Sites are approximately \$128,580/year (\$42,860 per site, inclusive of operator wages and associated fringe burden rate), which is currently subsidized through the water rate as no user fees are charged.

The RV dump sites receive approximately 2,200 dumps per year. Noting the above expenses, the current cost to provide this service is approximately \$58.45 per dump, compared to an average cost of \$15.25 per dump at alternate service providers within CGS boundaries.

Based on the issues identified in this report, the options available for the Sudbury and Valley East Wastewater Treatment Plants are shown below. No options are listed for the Chelmsford WWTP, as the layout of the facility does not provide sufficient space to address site access and safety concerns.

Facility	Sudbury WWTP	Sudbury WWTP	Sudbury WWTP	Valley East WWTP
Option	 Minor changes to address AODA issues; No user fees 	 Minor changes to address AODA issues; Automated payment system 	 Major upgrades to address traffic & safety issues; Automated payment system 	 Major upgrades to address traffic & safety issues; Automated payment system
Accessibility Costs	\$4,250	\$4,250	N/A	\$4,250
Capital Costs	N/A	N/A	\$426,835	\$111,270
Fee Collection	N/A	\$8.934	\$8,934	\$8,934
Total Upgrade Cost	\$4,250	\$13,184	\$435,769	\$124,454
Labour Costs	\$42,860	\$42,860	N/A	N/A
Utilities Costs	\$550	\$1,100	\$1,100	\$1,100
Fee Collection Rental & Maintenance	N/A	\$2,852	\$2,852	\$2,852
Total Annual Cost	\$43,410	\$46,812	\$3,952	\$3,952

The recommended option is to complete the installation of an automated payment system and required accessibility modifications at the Sudbury Wastewater Treatment Plant at an estimated installation cost of \$13,184 with annual operating costs of approximately \$46,812 per year to be funded from Wastewater operating funds.

If approved, a business case will be developed for the 2022 budget deliberations to determine a full cost recovery user fee for the RV dump service.

Executive Summary

The City of Greater Sudbury operates free Recreational Vehicle (RV) Wastewater Dumping stations at the Sudbury Wastewater Treatment Plant (Kelly Lake Road, Sudbury), the Valley East Wastewater Treatment Plant (Yorkshire Drive, Val Caron), and the Chelmsford Water Pollution Control Plant (Laurette Street, Chelmsford). Due to the COVID-19 pandemic, and the associated state of emergency declared by the City, the sites at Chelmsford and Valley East were not opened in 2020 and remain closed in 2021. The dump site at the Sudbury WWTP is currently open 24 hours a day, 7 days a week.

These legacy installations present a number of safety issues to users and currently do not comply with the Accessibility for Ontarians with Disabilities Act (AODA). Continued operation in their current configurations pose a risk to the City, and to facility users. The identified operational and safety risks include:

- Lack of appropriate turn around areas, increasing risk of collision with vehicles or pedestrians;
- Lack of appropriate signage and traffic indicators;
- Close proximity to operational activities and process hazards at the Chelmsford WPCP and Valley East WWTP, and;
- Potential interference with City, contractor or emergency services vehicles on site.

An assessment of the service level provided also indicates that allowing for RV dumping at wastewater treatment facilities is not a common practice among comparable municipalities in Northeastern Ontario and that the costs incurred by CGS are significantly higher than fees charged by alternate service providers.

Based on the information presented in this report, it is recommended that:

- 1. The Chelmsford WPCP RV Dump Site be closed due to insufficient maneuvering space for RVs & other vehicles, lack of upgrade opportunities and proximity to process hazards;
- 2. The Valley East WWTP RV Dump Site be closed in its current configuration due to the access issues and close proximity to process hazards;
- 3. Modifications be completed to the Sudbury WWTP RV Dump Site to address traffic flow, accessibility issues, site access issues and install a user fee collection system and;
- 4. The City work with local businesses, or identify appropriate municipal properties, to develop new RV dump sites that meet legislated and safety related requirements.

Background

Site Use Data

The RV dumping sites operated by the City of Greater Sudbury offer the ability for users to empty greywater or wastewater tanks into a 4-inch opening in the center of a public works manhole cover. Users empty their tanks by gravity through a flexible discharge hose, and there is non-potable water provided at each station for rinsing the emptied tanks and performing any necessary cleanup. These sites are subsidized through the water rate and have operated with no user fees at the following locations:

- 1) Sudbury Wastewater Treatment Plant, 1271 Kelly Lake Road, Sudbury
- 2) Chelmsford Water Pollution Control Plant, 265 Laurette Street, Chelmsford
- 3) Valley East Wastewater Treatment Plant, 1800 Yorkshire Drive, Val Caron

Prior to the COVID-19 pandemic, and associated state of emergency, the operating hours for the three sites were as follows:

Table 1: RV Dump Site Operating Times

Facility	Operating Period	Hours of Operation
Sudbury WWTP	Open all year	24 hours/day, 7 days/week
Valley East WWTP Chelmsford WPCP	First Tuesday after Victoria Day to First Tuesday after Thanksgiving	Sunday to Thursday: 08:00 to 19:30 Friday: 08:00 to 15:00 Statutory Holidays: Closed

Total dump site use data is shown in Table 2 for the past four years. During the period from 2017 to 2019, Chelmsford and Valley East represented approximately 51% of all site uses, with total site visits decreasing approximately 11.5 % in 2020 as a result of the COVID-19 pandemic:

Table 2: RV Dump Site Use, Total Loads Received

Location	Total Loads Received			
Location	2017	2018	2019	2020
Chelmsford WPCP	720	0*	19	0**
Sudbury WWTP	855	1,164	1,203	1,941
Valley East WWTP	789	945	891	0**
Total	2,364	2,109	2,113	1,941
* Chelmsford WPWP RV Dump site closed in 2018 due to construction				
** Facility closed due to COVID-19 pandemic				

Additional user postal code data was voluntarily collected at the Valley East and Chelmsford sites in 2017 and 2018. This postal code data indicates not only the area in which the RV dump site user resides (Table 4) but also if the user's home address is within any of the 12 established sewer sheds within the boundaries of CGS (Table 4). Users that are located outside an established sewer shed do not pay CGS water rates, and therefore do not contribute to the funds that subsidize this service.

Table 3: RV	' Dump Site	Use, by Area
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Chelmsford WWTP		
Area	% of Visits	
Chelmsford	47 %	
Azilda	13 %	
Dowling	6 %	
CGS, Other	9 %	
Non-CGS	10 %	
No Data Given	15 %	

Valley East WWTP	
Area	% of Visits
Hanmer	37 %
Val Caron	21 %
CGS, Other 13	
Non-CGS	9 %
No Data Given 20 %	

Table 4: RV Dump Site Use, by User Status Within Sewer Shed

Postal Code Location	% of Visits
Inside Sewer Shed	24.3%
Outside of Sewer Shed	12.5%
Unknown - Postal Code Extends Over Sewer Shed Boundary	63.2%

An examination of GIS data for the postal codes flagged as "Unknown" in Table 4 indicates that 78.8% of residential addresses in these areas are part of an established sewer shed, and 21.2% are not. For the purposes of this evaluation, we will assume that this distribution remains consistent for RV dump site users.

Assuming all sites receive a total of 2,200 visits per year, the data in Table 3 and Table 4 can be used to generate the following estimates:

Table 5: Summary of Dump Site Users by Home Address

Home Address of Dump Site User	Uses/Year (Estimated)	% Uses/Year (Estimated)
Non-CGS Residents	200	9.1 %
CGS Residents Outside Established Sewer Shed (Non-Water Rate Payer)	370	16.8 %
CGS Residents Inside Established Sewer Shed (Water Rate Payer)	1,630	74.1 %

We can therefore estimate that 570 dumps/year (25.9 % of all visits) would be from users who do not contribute to the water rate used to subsidize this service.

Finally, based on operator accounts, many of the people that use the dump sites do so more than one time per year. A conservative estimate is that there are 1,000 to 1,500 unique CGS residents who use the dump sites annually.

Safety Concerns & Operational Issues

The wastewater treatment facilities that host the RV dump sites were constructed in the 1970s. As such, the sites were designed to accommodate recreational vehicles of that era and also to adhere to the legislative and safety requirements of that time. Since that time, the size and volume of RVs have changed and so have the legislated requirements for the city to take all reasonable precautions to safeguard the public and our employees.

The risk posed by the current configuration of these facilities has been demonstrated in 2021, where two accidents have occurred at the Sudbury WWTP involving Recreational Vehicles. Though these incidents did not result in personal injury (only damage to the vehicles involved), they do highlight some of the issues present when providing this service at an operating Wastewater Treatment Plant.

In order to properly evaluate the three RV dump sites, risk assessments were completed by a CGS Health and Safety Advisor. Additional assessments on the facility layouts were completed by EPS, Inc. to identify capital costs for addressing traffic flow issues. The results of these evaluations were as follows:

Facility	Chelmsford WPCP
Hazards Identified	 Facility layout does not allow for a proper RV turn around area, creating hazards for pedestrians and other vehicles. RV dumping activities can restrict access to site for City or emergency services vehicles. Additional traffic on site increases the risk of vehicle or pedestrian collision. Dumping location is in close proximity to process hazards.
Potential Controls	 Erect additional signage indicating proper traffic flow and safety precautions. Erect signage indicating that children and pets must stay in the vehicle while on site. Close facility gate when City vehicles require movement on site, or when work is being done in a confined space. Modify facility gate to allow for greater vehicle access (not possible due to facility location & layout). Modify roads/parking area to allow for proper vehicle turn-around (not possible due to facility location & layout).
Recommendation	Due to insufficient maneuvering space for RVs & other vehicles, lack of upgrade opportunities and proximity to process hazards it is recommended that this site be closed for RV dumping.

Table 6: Chelmsford WWTP Risk Assessment Summary



Figure 1: Chelmsford WPCP Boundaries (left) and Entrance View (right)

Table 7: Sudbury WWTP Risk Assessment Summary

Facility	Sudbury WWTP
Hazards Identified	 RV dumping activities can restrict access to site for City or emergency services vehicles. RV dumping activities can interfere with equipment movement and chemical deliveries. Additional traffic on site increases the risk of vehicle or pedestrian collision.
Potential Controls	 Erect additional signage indicating proper traffic flow and safety precautions. Erect signage indicating that children and pets must stay in the vehicle while on site. Re-paint area around RV dump site to account for actual RV position while dumping. Ensure all City employees wear high visibility clothing when working in the area. Delineate designated walkways for CGS employees to reduce the risk of vehicle/pedestrian collisions. Restrict access to RV dump area when on site vehicular traffic presents a risk (e.g.: forklifts, delivery trucks, etc.). Restrict access to RV dump area during set periods to allow for operations and maintenance activities. Re-locate RV dump site to an area outside of the fenced plant perimeter.
Recommendation	 Modify the existing RV dump station and standard operating procedures (SOPs) to: Improve traffic flow (additional signage, line painting); Restrict access during periods with operational or maintenance activities in the area; Increase operator visibility, and; Address AODA concerns.



Figure 2: Sudbury WWTP RV Dump Site

Table 8: Valley East WWTP Risk Assessment Summary

Facility	Valley East WWTP
Hazards Identified	 Facility layout does not allow for a proper RV turn around area, creating hazards for pedestrians and other vehicles. RV dump site is in close proximity to active operations and process hazards. RV dumping completely blocks access to the site for City or emergency services vehicles, as dumping station is approximately 10 feet inside gate. Additional traffic on site increases the risk of vehicle or pedestrian collision.
Potential Controls	 Erect additional signage indicating proper traffic flow and safety precautions. Erect signage indicating that children and pets must stay in the vehicle while on site. Close facility gate when City vehicles require movement on site, or when work is being done in a confined space. Modify facility gate to allow for greater vehicle access. Modify roads/parking area to allow for proper vehicle turn-around.
Recommendation	Due to the serious access issues and close proximity to process hazards, it is
	recommended to close the site in its current configuration.



Figure 3: Valley East WWTP RV Dump Site

In addition to the above assessments, additional safety issues have been raised through:

- Citizen complaints concerning RV traffic on Yorkshire Drive and Laurette Street, including RVs blocking access to private driveways and causing hazards to local residents, and;
- Operations Joint Health and Safety Committee Concern/Suggestion forms submitted by CGS employees highlighting:
 - Operator exposure to RV dump material when spilled or not dumped correctly;
 - o Safety for members of the public who are in close proximity to operating equipment;
 - Traffic control, and;
 - Inappropriate use of non-potable water on site.

If CGS continues to operate this service, it is critical that additional investment be made in the sites to mitigate the risk of injury to users and staff.

Occupational Health & Safety Act Impact

In order to ensure that the evaluation of these sites was as complete as possible, it was necessary to understand if there were any legislated requirements for members of the general public to use the RV dump sites. Specifically, concerns have been raised in the past with the definition of a "worker" under the Occupational Health & Safety Act (OHSA), and whether or not an RV dump site user would classify as such.

Under the OHSA, a "worker" is defined as:

"...any of the following, but does not include an inmate of a correctional institution or like institution or facility who participates inside the institution or facility in a work project or rehabilitation program:

- 1. A person who performs work or supplies services for monetary compensation.
- 2. A secondary school student who performs work or supplies services for no monetary compensation under a work experience program authorized by the school board that operates the school in which the student is enrolled.
- 3. A person who performs work or supplies services for no monetary compensation under a program approved by a college of applied arts and technology, university, private career college or other post-secondary institution.
- 4. REPEALED: 2017, c. 22, Sched. 1, s. 71 (2).
- 5. Such other persons as may be prescribed who perform work or supply services to an employer for no monetary compensation; ("travailleur")"

Based on the above, members of the public should not be considered workers under the OHSA as they do not "perform work" (i.e. receiving some type of compensation, monetary or non-monetary) or "supply services" to the City of Greater Sudbury. As such, RV Dump Site users do not require specific training or Personal Protective Equipment to use the facilities. However, it is important to note that this does not eliminate the need for the City to be duly diligent and address all reasonable safety concerns associated with these sites.

Accessibility Issues

The three dump sites were evaluated by AccessAbility Advantage in 2017 in order to determine what upgrades would be needed to meet the requirements of the *Accessibility for Ontarians with Disabilities Act (AODA)*. The final report received identified the following deficiencies:

- Dump station holes are located below ground surface, with sloped edges (to promote drainage) of anywhere from to 17 to 23 %.
 - Modifications would be required to ensure the safety of users with mobility devices or those who have trouble walking on uneven surfaces.

- An extension or permanent apparatus would be required to place controls for the dump hole within the recommended range of 400 to 1,200 mm above ground level.
- The dump station holes and the non-potable water valves require grasping and 10 lbs. of force to operate.
 - All levers, knobs, latches, handles and other controls should be operable with a closed fist and maximum 5 lbs. of force.
- Surrounding paths and surfaces to the dump station holes and non-potable water stations present challenges to users with mobility devices.
 - Modifications would be required to ensure all equipment was located on a proper firm, level pathway.
- Signage installed at all locations do not include pictograms or sufficient cautionary warnings.

The modifications required to address these deficiencies are not significant, and would also ensure that these sites meet the intent of the City's Accessible Customer Service Policy. An evaluation performed by Environmental & Power Solutions (EPS), Inc. in June 2021 estimated the following costs for the Sudbury WWTP:

•	New signage indicating RV dump site and traffic direction:	\$	500
•	Wash down (non-potable) water upgrades:	\$	250
٠	Foot pedal/lever operated dumping station cover:	\$ 2	2,500

Costs were not evaluated for the Valley East and Chelmsford sites, as the recommendation from EPS was that these sites be closed due to the operational issues presented above.

Operating Costs

Based on the resources required, the overall operating costs for the RV dump sites can be broken down into three main components; treatment costs for the material received, material/utilities costs and labour costs to staff the sites. These are as follows:

• Treatment Costs: Negligible

The total volume of discharged material is estimated to be approximately 300 m³/year. The costs for treating this volume of wastewater are considered negligible as, for instance, the Sudbury WWTP processes approximately 65,000 m³/day.

• Materials/Utilities Costs: Negligible

Current materials and utilities costs are considered negligible as there is no automated equipment and minor repairs are only performed on an "as needed" basis.

• Labour Costs: \$128,582/year

Costs associated with temporary wastewater operators posted at the three sites from Victoria Day to Thanksgiving are approximately \$42,860 per site, consisting of \$27,650 in direct wages plus the associated fringe burden rate.

Using the previous assumption (based on 2017-2019 data) of 2,200 dumps per year, the current cost of operations equates to approximately \$58.45 per use.

In their current configuration, a small amount of consumable resources are required to operate each site; most notably the provision of non-potable water and minor repairs as required to valves and hoses.

In order to assist with RV dumping during peak periods, a casual wastewater operator is posted to each facility for the period from Victoria Day to Thanksgiving. These temporary postings allow for dedicated resources to assist RV dump users, maintain equipment and conduct general housekeeping. Additionally, the casual operators ensure that the full time operators are able to focus on the safe and efficient operation of the treatment facility in question.

Cost Recovery & Facility Upgrades

Currently there is no cost recovery mechanism in place for the RV dump sites. A number of options exist if a user fee is implemented, from manual payments to automated systems. However, any consideration of payment system must also consider the safe operation of the treatment facility, as operators may not be available at all times if performing critical operational tasks. As such, the implementation of an automated system is preferred.

In order to address the safety & operational issues identified in this report, a number of options are presented in Table 9 for the Sudbury and Valley East WWTP. For all of the options, the following assumptions are made:

- 1. Base utility costs are estimated at \$550/year for an upgraded system, and \$1,100/year for options with an automated fee collection system;
- 2. Operation of a dump site without addressing traffic control issues will require an operator posting during peak periods (as is current practice), and;
- 3. Operation of a dump site with full capital upgrades will not require an operator posting during peak periods.

Nothing the above assumptions, the following options are presented:

Sudbury WWTP (Minor changes, no user fee)	 No modifications made to overall facility configuration (dedicated operator still required during peak periods); Additional signage and equipment upgrades completed to address AODA requirements, and; No user fees collected for service.
Sudbury WWTP (Minor changes, \$15 user fee)	 No modifications made to overall facility configuration (dedicated operator still required during peak periods); Additional signage and equipment upgrades completed to address AODA requirements, and; Implementation of automated payment collection system to collect user fees.
Sudbury WWTP (Major upgrades, \$15 user fee)	 RV dumping area relocated outside of security fence to better control traffic on site (as shown in Figure 4); AODA standards included in new dump site design, and; Implementation of automated payment collection system to collect user fees.
Valley East WWTP (Major upgrades, \$15 user fee)	 Relocation of facility security fence to better control traffic on site (as shown in Figure 5); Installation of gravel road loop to act as staging and turn around area (as shown in Figure 5); Additional signage and equipment upgrades completed to address AODA requirements, and; Implementation of automated payment collection system to collect user fees.

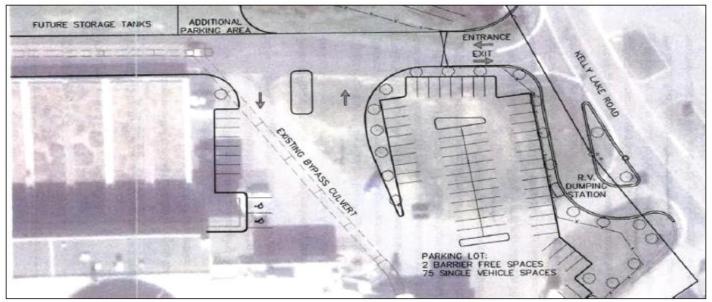


Figure 4: Sudbury WWTP RV Dump Site Conceptual Design



Figure 5: Valley East WWTP RV Dump Site Conceptual Design

Table 9: Cost Recovery & Payback Periods

Facility	Sudbury WWTP	Sudbury WWTP	Sudbury WWTP	Valley East WWTP
Option	 Minor changes to address AODA issues No user fees 	 Minor changes to address AODA issues Automated payment system 	 Major upgrades to address traffic & safety issues Automated payment system 	 Major upgrades to address traffic & safety issues Automated payment system

Utilities Costs	\$550	\$1,100	\$1,100	\$1,100
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Labour Costs	\$42,860	\$42,860	N/A	N/A
Total Upgrade Cost	\$4,250	\$13,184	\$435,769	\$124,454
Fee Collection	N/A	\$8.934	\$8,934	\$8,934
Capital Costs	N/A	N/A	\$426,835	\$111,270
Accessibility Costs	\$4,250	\$4,250	N/A	\$4,250

Preliminary calculations indicate a user fee of approximately \$25 per dump would be required to achieve full cost recovery with one site operating, with a higher user fee required if multiple sites remain in operation. It is important to note that implementing a fee in excess of the average value changed by alternate service providers (approximately \$15.25 per dump) would present a risk to any cost recovery model.

Service Level Comparison

In order to assess the level of service provided by the City of Greater Sudbury, a set of questions was sent to neighbouring municipalities to determine:

- 1. Does your municipality accept RV dumping at your wastewater treatment facilities?
- 2. Does your municipality charge a fee for this service?
- 3. If a fee is charged, how is it collected (cash on site, automated system, swipe cards, tickets, etc.)?

The answers received as of the date of this report are as follows:

Municipality	Response	Details		
City of Sault Ste. Marie	Yes	 RV dumps are accepted at wastewater treatment facilities. Fees are not charged for residential users, but are being considered for commercial vehicles. Collection of fees for commercial vehicles will be done using a swipe card system. 		
City of Timmins	No	PV dumping convision are provided by privately owned facilities		
City of North Bay	No	RV dumping services are provided by privately owned facilities within the municipality.		
Town of Espanola	No			

Table 10: Status of RV Dumping in Neighbouring Municipalities

Alternate Service Providers

As indicated above, RV dumping services are widely available through private service providers and campgrounds across the province. A search of existing locations within the boundaries of the City shows that the following sites accept RV dumps:

Table 11: Existing RV Dump Service Providers within CGS Boundaries

Name	Location	System Type	Availability	Cost
Holiday Beach	3655 Regional Road 55	Septic	Only available to	Not Listed
Campground	Whitefish, Ontario	System	site users	
Mine/Mill 598 2550 Richard Lake Drive		Septic	Only available to	\$20.00
Campground	Sudbury, Ontario	System	site users	
Carol Campsite RV	2388 Richard Lake Drive	Septic	Only available to	\$10.00
Park	Sudbury, Ontario	System	site users	
Camp Maple	1547 Fairbanks E Rd	Holding Tank	Only available to	Not Listed
Mountain Campsites	Whitefish, Ontario		site users	
Windy Lake	51 Pine St	Unknown	Day pass	\$15.50
Provincial Park Onaping, Ontario			required	(Day Pass Fee)
Fairbank Provincial 696 Park Rd		Holding Tank	Day pass	\$15.50
Park	Worthington, Ontario		required	(Day Pass Fee)

When contacted, these sites indicated that they accept RV dumps from campsite users or, in the case of provincial parks, day pass holders. The average cost for the four sites with sufficient information posted was \$15.25 per dump. The privately owned (i.e. non-provincial park) sites contacted all indicated that their systems currently do not have capacity to accept additional loads beyond their camp site users, and that they are currently not interested in expanding their capacity due to the low return on investment.

Based on interviews conducted with RV dump sites accessible to the public in other municipalities, it is evident that a RV dump site is not a viable business opportunity on its own but can be used to service or support existing offerings (gas stations, RV dealerships). With this in mind, a high-level selection criteria could prioritize sites that:

- Replicate existing service availability (i.e. Valley East, Chelmsford & Sudbury);
- Are easily accessible from regional highways;
- Possess sufficient space for required equipment, and to permit access and turn around areas for vehicles over 40 feet in length;
- Possess access to the existing sanitary sewer collection system to minimize installation and operational costs, and;
- Already provide a service complimentary to a RV dumping station.

Using these criteria, EPS Inc. conducted a survey of local businesses that gauged the level of interest for provided these services. The responses received indicate that a number of local businesses were very interested if an incentive was offered to offset construction or setup costs, and that most interviewees were unsure of the regulatory requirements to offer this service to the public.

Noting these responses, discussions with CGS stakeholders (including Economic Development and Water/Wastewater Compliance & Operational Support) indicate that assistance would be available for business owners to:

- Develop RV dump sites as part of existing or new businesses;
- Implement appropriate monitoring to ensure compliance with the sewer use bylaw, and;
- Create appropriate procedures for dump site operation and spill response.

Resources Cited

- 1. RV Dump Station Accessibility Review, AccessAbility Advantage (A joint venture between March of Dimes Canada and Quadrangle Architects Ltd.), November 17th 2017
- 2. RV Dumping Station Investigation, Environmental & Power Solutions Inc. (EPS), August 11th 2021
- 3. CGS Risk Assessment for RV Dumps at Waste Water Depots, Chelmsford Depot, May 26th 2021
- 4. CGS Risk Assessment for RV Dumps at Waste Water Depots, Kelly Lake Depot, May 26th 2021
- 5. CGS Risk Assessment for RV Dumps at Waste Water Depots, Valley East Depot, May 26th 2021