



The Corporation of the Town of Tecumseh

Public Works & Engineering Services

To: Mayor and Members of Council

From: Phil Bartnik, Director Public Works & Engineering Services

Date to Council: October 10, 2023

Report Number: PWES-2023-65

Subject: Ministry of Environment, Conservation and Parks
Consolidated Linear Infrastructure
Environmental Compliance Approval
Sanitary Collection System & Stormwater Management System

Recommendations

It is recommended:

That Report PWES-2023-65 entitled “Ministry of Environment, Conservation and Parks, Consolidated Linear Infrastructure Environmental Compliance Approval, Sanitary Collection System & Stormwater Management System”, **be received**.

Executive Summary

The purpose of this report is to inform Council of recent changes to the regulatory environmental permissions framework guiding the approval process for sanitary and stormwater infrastructure, found within Section 53 of the *Ontario Water Resources Act*. This report also presents the resulting impacts to the Town.

The Ministry of Environment, Conservation and Parks (MECP) has adopted a modernized environmental permissions framework for sewage works, known as the Consolidated Linear Infrastructure Environmental Compliance Approval (CLI-ECA). This new approach replaces the previous “pipe-by-pipe” approvals framework for municipal sewage works (storm and sanitary) and instead captures past, present, and future approvals into a system-wide ECA document. The CLI-ECA contains updated terms, conditions, and design criteria intended to enhance environmental protection and

improve the consistency of system design, construction, operation, and maintenance. It has been modeled after the permissions framework for municipal drinking water systems that was established in 2009.

This new process maintains municipal responsibility for the Town storm and sanitary systems and introduces a widened scope of review, approval, and operational requirements for sewage works (alterations). The CLI-ECA offers a pre-authorization tool that eliminates the need for an ECA application each time an alteration, such as extensions, replacement, or additions to the storm and/or sanitary systems is proposed to the system. Instead, it enables municipalities to proceed at their own consent, provided the works are designed and built in accordance with new MECP Design Criteria. This concept also applies to new private developments that municipalities will assume ownership of once completed. In these cases, municipal review and approval is also required prior to construction.

The Town's sanitary and stormwater systems are also subject to mandatory operations, maintenance, and reporting requirements, resulting in increased responsibility to develop an internal management system to track on-going maintenance and operations activity to fulfill eventual yearly reporting requirements for the entire system. **Meeting the mandatory requirements of the new CLI-ECA creates several impacts to the Town, such as increased operations and maintenance activities and increased staff time for reviews, approvals, record keeping, reporting, etc.**

This Administrative report will provide an overview of the new MECP CLI-ECAs and how it will impact the Town's operations and staffing resources, including:

- Background of previous ECAs and the new CLI-ECAs
- Overview of the CLI-ECA Document
- Changes to Scope of Municipal Responsibility within ECAs
- Impacts to the Town
- Town Operations
- Staffing Capacity
- CLI-ECA Fee Collection
- Next Steps

Background

In Ontario, Section 53 of the *Ontario Water Resources Act* requires municipalities and developers to obtain an Environmental Compliance Approval (ECA) to use, operate, establish, alter, extend, or replace sanitary or stormwater infrastructure. ECAs and their predecessor Certificates of Approval, form the foundation of environmental approvals for sewage works in Ontario dating back to the 1970s. Under this dated approach, municipalities were required to conduct extensive engineering review of proposed municipal infrastructure design and submit an ECA application to the Ministry of

Environment, Conservation, and Parks (MECP) for their review and approval each time a project involving sewage works was proposed. This historically led to high volumes of applications and long wait time for approvals, which delayed project startup and completion.

In the recent past, the MECP attempted to improve the efficiency of issuing sewage works approvals through a Transfer of Review (TOR) Program. The TOR Program permitted municipalities to review (on behalf of the MECP) and recommend approval of ECA applications for eligible sewage works to the MECP; this was primarily for non-complex or low risk works on publicly owned infrastructure. MECP has now further advanced the sewage works approvals framework to the new CLI-ECA process. The goal of the CLI-ECA is to get important, low risk public infrastructure projects built sooner by reducing the time it takes between identifying the need for infrastructure improvements and constructing same. With the implementation of the CLI-ECA, the MECP will be phasing out the previous TOR Program.

This new system-wide approach includes one approval for the Town's entire storm sewer system and one approval for the Town's entire sanitary system. It covers all previously issued and, subject to specified conditions being met, all future sewage work approvals. The roll-out of CLI-ECA coincides with the recent adoption of O.Reg. 208/19 Environmental Compliance Approval Regulation in Respect of Sewage Works Regulation in July 2019, which enables prescribed persons, such as developers, to make alterations to a municipal sewage system without a separate approval if specific conditions are met.

Through the CLI-ECA process, Town infrastructure and alterations of the same, are subject to updated terms and conditions related to approval, operation, and maintenance. This includes existing infrastructure that pre-dates the CLI-ECA process. Additionally, new sewage works can be pre-authorized by satisfying new design criteria issued by the MECP. Assuming all applicable requirements of the CLI-ECAs are met, it is intended that municipalities (and third parties such as developers constructing sewage infrastructure on behalf of the municipalities) can proceed without having to obtain separate MECP approvals. **Traditional ECA applications are retained within a lone component of the consolidated approval, but is strictly meant for instances where an alteration deviates from the CLI-ECA design and construction requirements due to project constraints (i.e. site conditions).** Once construction of an alteration is complete, the Town's CLI-ECA documents will be updated to include the alteration and all operation and maintenance provisions will apply to the alteration.

In summary, the Town is responsible for verifying that sewage works approved through CLI-ECA are designed and constructed in compliance with new design criteria, or obtaining amendments to the CLI-ECA where they cannot be met while ensuring the system is operated and maintained as per defined terms and conditions. **This change will transmit responsibility for approvals of sewage works from the provincial level to the municipalities in Ontario.**

Participation in the CLI-ECA program is mandatory for municipalities in Ontario. MECP required all municipalities to enroll into the CLI-ECA program by application. The application included submission of all existing records of the municipal stormwater and sanitary conveyance systems and associated details. The Town successfully submitted CLI-ECA applications on January 25, 2022. MECP approved and issued the Town's sanitary sewer system CLI-ECA #040-S701 (Attachment 1) and stormwater management system CLI-ECA, #040-W601 (Attachment 2) on April 28, 2023. The CLI-ECA process includes a transitional period for projects that commenced before the date of issuance, however, updated terms and conditions are in full effect for all new works which commence after the date of issuance.

The current version of MECP's new Design Criteria, titled "Design Criteria for Sanitary Sewers, Storm Sewers, Forcemains for Alterations Authorized under an Environmental Compliance Approval" is v.2.0 dated May 31, 2023. It is expected that MECP will periodically update this information as municipalities incorporate the new design requirements into projects and related feedback is provided to MECP.

Comments

Overview of CLI-ECA Document

The CLI-ECA document is presented in a series of schedules with a prescribed format to maintain ease of use and accessibility. CLI-ECA's are issued separately for municipal sanitary and stormwater collection systems as each contains specific requirements.

A brief summary of each Schedule is included below to help provide a basic understanding of the document:

1. **Schedule 'A': System Information**

This section provides an overview of the system and identifies the CLI-ECA issue date as well as a future review due date. This section also lists applicable documents such as the MECP design criteria, stormwater master plans and the Town's asset management plan. In addition, the system name, owner and operating authority are identified. Updates to this schedule are administered through the application for review process and may include new or updated documents and/or, a change in the operating authority.

2. Schedule 'B': System Description

A summary description of all known municipal infrastructure in each system is provided in this section. This information was provided in the original CLI-ECA application submitted by the Municipality, which included infrastructure maps and details on the components of each system. Updates to this schedule are administered through mechanisms identified in the CLI-ECA.

3. Schedule 'C': List of Notices of Amendment to this ECA; Additional Approved Sewage Works

This section documents alterations to the system that are not pre-authorized through CLI-ECA terms and conditions since the scope of works does not satisfy specified criteria and therefore requires approval through a separate technical application process. Schedule 'C' notices are granted as an amendment to the CLI-ECA by the MECP and the process for obtaining these approvals follows the standard (traditional) ECA application process.

4. Schedule 'D': General

Schedule 'D' specifies the terms and conditions that must be met for municipalities to issue approval for pre-authorized alterations. Responsibility for ensuring compliance is delegated to the municipality and the Licensed Engineering Practitioner of the works and is documented on consent and verification forms. The Licensed Engineering Practitioner provides confirmation regarding the design and the municipality verifies pre- and post-construction compliance in accordance with terms and conditions specified in this section.

5. Schedule 'E': Operating Conditions

The system as defined in Schedule 'B', including any pre-authorized alterations, must adhere to the specific operating conditions outlined in this section. These conditions describe the duties of municipalities and operating authorities related to monitoring, inspection, and maintenance to verify operational performance of the system. Part of this section includes a series of deliverables to be developed and administered by the municipality.

6. Schedule 'F': Residue Management

All applicable standards and documents adopted by the Town for the beneficial re-use of sediment, soil, and other residue from alterations to the system are identified within this section. However, this is not applicable to the Town's systems.

7. Appendix 'A': Stormwater Management Criteria

Appendix 'A' outlines the new performance criteria for new development and retrofit scenarios through CLI-ECA. Compliance with this criterion is to be verified by the municipality for related pre-authorized sewage works.

Changes to Scope of Municipal Responsibility within ECAs

The scope of changes to municipal involvement in the ECA process can be outlined in two core components: A) Review and Approvals, known as Schedule 'D' in Town's CLI-ECA and B) Operations and Maintenance (O&M) and Reporting, known as Schedule 'E' in Town's CLI-ECA.

A. Review and Approvals (Schedule 'D' in the Town's CLI-ECA)

The municipality will be required to complete and retain consent and verification forms for alterations proposed to the Town's storm and sanitary collection systems as identified under Schedule 'B' of the CLI-ECAs. Once completed, the prescribed forms serve as the standing approval for any of the following sewage works:

- Modification, replacement, or extension of sanitary or storm sewers or forcemains, including new development
- Addition of or modification of existing:
 - Sanitary and Storm Pumping Stations
 - Stormwater Management Facilities
 - Equipment with Emissions to Air (e.g. emergency power generators or venting for odour control)
 - Third Pipe Collection Systems
 - Real-Time Control Systems (SCADA)
 - Collection System Storage, Tanks, and Structures
 - Odour Control Units

It is expected that municipalities develop internal procedures that integrate completion and retention of the consent and verification forms and related terms and conditions into sewage works led by new development and municipal Capital Works.

Consent and verification forms are prescribed based on each system and their respective components (i.e. sewers, facilities, third pipe collection, equipment with emissions to air). Completion of the applicable forms denote compliance

with the CLI-ECA terms and conditions. The forms require verification by the municipality and the Licensed Engineering Practitioner before construction commences. Once construction is completed, the municipality is to verify that the inspection and testing requirements of the CLI-ECA have been met. Completed forms are to be retained by the municipality for at least 10 years and can be requested by the MECP at anytime.

As per a condition of CLI-ECA, municipalities are also required to submit Director Notification Forms to add details of completed alterations to Schedule B. They also serve as a notification to MECP of an alteration being serviced and can be utilized to make administrative updates to the CLI-ECA as a whole. Nonetheless, the Town is required to manage submission of the Director Notification Form in accordance with the terms and conditions outlined in the CLI-ECA.

As part of the CLI-ECA process, municipalities are also required to ensure that Erosion and Sediment Control (ESC) Plans are prepared and implemented during construction activities. This includes undertaking inspections and maintenance of the ESC measures at defined intervals and maintaining a secure records retention protocol for this information. The plan must have regard to CSA standards and erosion and sediment control publications recommended by the MECP.

B. Operations and Maintenance (O&M) and Reporting (Schedule 'E' in the Town's CLI-ECA)

In order to comply with the CLI-ECA, operational conditions must be fulfilled for each municipal system. Specifically, the following deliverables are to be produced, maintained, and updated where necessary for the operational life of works identified:

- Records retention of consent and verification forms and ESC plans and inspections
- Complete prescribed studies and plans for operational performance of system
 - Operations and Maintenance Manual(s)
 - Source Water Protection: Significant Drinking Water Threat (SDWT) Assessment Report
 - Monitoring Plan (Storm) and Monitoring/Sampling Protocol (Sanitary)
 - Assessment of Wet Weather Flows to Dry Weather Flows (Sanitary)
 - Sanitary Sewer Model
 - Storm Sewer Catchment Inventory

- On-going reporting of system performance and alterations completed
 - Annual Performance Reports
 - Spills/Event and Collection System Overflow Reporting (Sanitary)
- Installation of public signage for outlets and stormwater management facilities
- Application for CLI-ECA review
- Response to audit requests by MECP to demonstrate compliance

It is identified that specific deliverables, such as source water protection reporting, monitoring plan (with peer review by a third-party Qualified Person), annual performance and spills/events reporting, will remain the responsibility for the owner or municipality to complete. Other studies can, and will most likely require, third-party efforts to complete on the Town's behalf. Nonetheless, prescribed persons, operating authorities, and owners (municipalities) share responsibility in maintaining the operating terms and conditions within CLI-ECA. Coordination between parties will be critical in complying with the CLI-ECA requirements.

Plans and studies produced will serve as living documents for the system's operating authority to conduct inspections, maintenance, and monitoring to verify operational performance of the system. Reporting, responding to audit requests, and inventory updates are the responsibility of the municipality. Templates for deliverables have not been provided by the MECP. It is left for municipalities to develop related forms, protocol, and record keeping procedures to fulfill this requirement.

In the future, MECP may recommend that these operating conditions be structured and produced in a Quality Management System Operation Plan, similar to what was required for the Town's Drinking Water / Distribution System. The Town developed and currently maintains a Drinking Water Quality Management System Operation Plan (DWQMS), which was approved by Council in 2008. Development of a similar system would allow for clear definition of protocols and responsibilities as it relates to the CLI-ECA operational requirements for each system. Overall, developing sound record keeping practices will be critical in fulfilling the responsibilities noted in each component of CLI-ECA.

Impacts to the Town

It is important to recognize that the CLI-ECA Program will put new compliance pressures on Town Administration including, but not limited to the following:

- Develop an intake process to meet the review and approval requirements of CLI-ECA for new sewage works, including:
 - Screening eligibility for pre-authorization, completion of required forms and issuance of approvals, completing ECA applications;
 - Review of technical documents (drawing and reports) for compliance with new design and construction criteria;
 - Record keeping of ESC Plan implementation and compliance, associated forms for ECA pre-authorized alterations;
 - Periodic updating of Infrastructure map and inventory for CLI-ECA application for review.
- Respond to potential audit requests from MECP to demonstrate compliance;
- Update Town design standards and stormwater management criteria. The MECP has created design criteria for municipalities and developers to follow for certain types of collection system additions/alterations. This includes Low Impact Development (LID) measures to achieve the new enhanced level of stormwater control that are being mandated by MECP;
- Develop operational plans and manuals to fulfill the operational conditions of the CLI-ECA for each system and update when required. This includes:
 - Operations & Maintenance (O&M) Manual
 - Erosion and Sediment Control (ESC) Plans
 - Source Water Protection Assessment Reports
 - Monitoring Plan for Stormwater Management
 - Wet Weather to Dry Weather Flows Assessment
 - Storm Sewer Catchment Inventory Updates
 - Sanitary Sewer Model

- Implement internal procedures to carry out on-going routine inspections, maintenance, and monitoring to verify operational performance of the Town system. This includes the following components:
 - Inspection programs, including frequency of inspection and methods to detect when maintenance is necessary
 - Procedures for routine operation
 - Maintenance and repair programs
 - Source water protection requirements
 - Physical inspection and calibration of monitoring equipment or components
- Prepare and submit annual performance reports on the Town's storm and sanitary systems as part of MECP auditing including summaries of the following items:
 - Monitoring data collected as per plan
 - Operating problems encountered and corrective actions taken
 - Inspections, maintenance and repair of system components
 - Calibration and maintenance on monitoring equipment
 - Complaints related to Sewage works received from the public and steps taken to address
 - Alterations to the system, including source water protection threats
 - Spills or abnormal discharge events
 - Actions taken, including timelines, to improve or correct performance

The CLI-ECA primarily impacts the Public Works & Engineering Services Department. However, support from various other Town Departments will be necessary to fulfill the program requirements (i.e. Development Services, Financial Services and Technology and Client Services). **Additional resources will likely be necessary to fulfill all the compliance requirements.**

Town Operations

Successful implementation of the CLI-ECA program will require the Town to review and approve new infrastructure in accordance with MECP design guidelines, develop and implement planned operation, maintenance and monitoring activities, and develop detailed record keeping procedures for the Town's linear storm and sanitary infrastructure. The following items briefly describe the various components of the CLI-ECA in relation to Town activities:

- **New Projects (Town Capital and Private Development)**

With the Town's CLI-ECA now in effect, the Town is responsible for receiving, reviewing, and approving all planned low-risk sanitary and stormwater works for Town-led Capital Works projects and developer-led applications. The Town must establish a new business intake process and align resources to meet the scope of work required through CLI-ECA. Town staff continue to consult with the Ministry and other municipalities to better understand CLI-ECA terms, conditions, and requirements for incorporation into internal procedures.

The anticipated process for review and approval of developer-led applications includes Town sign-off as part of the Development Drawing submission. Once approved at that stage, signing off on the consent and verification ECA forms should be a formality and requirement of the development application. It is further anticipated that Capital Works projects can be pre-screened internally to determine if the scope of work will satisfy the pre-authorization requirements. Project administration, design and construction is often tendered out for Town-led infrastructure projects. CLI-ECA procedures, including form sign offs and design criteria, will be incorporated into Request for Quotation (RFQ) and Request for Tender (RFT) processes administered by the Town.

The timelines for review and approval will be better known once internal procedures and operating conditions are produced. Following receipt of a detailed and complete submission, it is anticipated that the review period could average 4-6 weeks for most standard sewage works (i.e. full subdivision review, pumping stations, stormwater management design, LID, etc.) with more complex projects requiring longer review periods.

- **Transition Period (Town Capital and Private Development)**

The Town is currently operating within the transition period of CLI-ECA. This provides municipalities time to update and station internal processes to align with CLI-ECA requirements and finalize the remainder of incoming works to be incorporated into CLI-ECA. Note that this period expires on July 30, 2024.

When the design stage of sewage works commences during or after the transitional period expires, CLI-ECA design criteria must be met to obtain pre-authorization under Schedule 'D' of CLI-ECA. This may cause changes to original designs to meet that criteria or prompt a separate approval to be obtained under a project specific Schedule 'C' notice. When efforts to undertake works, such as tendering or construction commencement, begins on or before the expiration of the transitional period, exemption from CLI-ECA design criteria is granted.

As part of this, Town staff must track projects that were approved under the previous ECA process or were in the final stages of design when the Town's CLI-ECAs were issued. These projects, which can be understood as transitional projects, are required to follow the CLI-ECA notification and operational requirements once constructed.

The primary role of Town staff for transition projects is to ensure that these works commence prior to the expiration date and once completed, to ensure that the operating conditions outlined in the Town's CLI-ECAs are fulfilled.

Currently, Town staff is utilizing the transitional period to isolate previously approved, in-progress, and upcoming projects to ultimately designate their status as it relates to the associated CLI-ECA requirements.

- **Operation and Maintenance of Existing Storm and Sanitary Infrastructure**

Resources for operation and maintenance of municipal infrastructure are to follow recommendations included in the Town's [Asset Management Plan, v.3.0](#) (2022), however, many of these maintenance activities have yet to be accounted for in previous budgetary and staffing considerations.

The Town's sanitary and stormwater systems are primarily operated and maintained by the Town's Public Works Division, with the exception of sanitary pumping stations. The Ontario Clean Water Agency (OCWA) has been retained by the Town to complete all operation and maintenance activities on the Town's sanitary pump stations. It is anticipated that the CLI-ECA operations, maintenance and performance reporting for sanitary pump stations could be completed by OCWA as they are an operating authority for this infrastructure.

Storm pumping stations are currently inspected and monitored by the Town's Public Works Division. All storm pump stations are continuously monitored through the Town's SCADA system. In addition, all storm pump stations are physically inspected at least once a week and after rain events. It is anticipated that additional monitoring and inspection record documentation will be needed to satisfy the new CLI-ECA requirements.

The Town's current operation and maintenance work for linear storm and sanitary infrastructure (sewers) is generally completed on an as needed basis. With the exception of periodic sanitary sewer inflow and infiltration (I&I) programs, the Town does not have a planned operations and maintenance schedule for linear storm and sanitary infrastructure. It is understood that operations and maintenance procedures will need to be developed and implemented to satisfy the new CLI-ECA requirements.

Staffing Capacity

Significant staff time has been incurred through the process of applying for and obtaining the Town storm and sanitary CLI-ECAs'. Work to date has included attending numerous CLI-ECA webinars, preparation and submission of the CLI-ECA applications, reviewing the requirements of the Town's approved CLI-ECA documents for each system, meetings with MECP to discuss specific Town questions/concerns, etc.

The capacity of Town resources needed to satisfy the requirements of the CLI-ECA outlined in this report will be monitored and assessed during the transition period. Similar assessments are underway by other municipalities within the Windsor-Essex Region, as follows:

1) Town of Amherstburg

Infrastructure Services at the Town of Amherstburg has requested one (1) full-time employee (FTE) to meet the new requirements set out in CLI-ECA.

2) Town of Essex

Essex's Infrastructure Services Department has identified a need for additional staffing and are currently undergoing review to define the capacity required.

3) Municipality of Lakeshore

Lakeshore's Engineering Division has been approved for two (2) additional full-time employees (FTEs) to accommodate the demands of CLI-ECA.

The MECP has structured the CLI-ECA similar to the framework established for the Drinking Water Quality Management System (DWQMS) for the Town's Drinking Water / Distribution System. The Town's DWQMS is managed by the Drinking Water Quality Officer (1.0 FTE) as well as all the Water Labourers performing inspection, field notes and documentation in accordance with the required reporting under the applicable legislation.

CLI-ECA Fee Collection

In downloading the review and approval process for environmental compliance approvals to municipalities through the new CLI-ECA process, MECP has also permitted municipalities to charge fees to developers seeking approval through this new process. Accordingly, costs associated with additional staff, resource allocation, etc. are eligible for recovery through the development of a CLI-ECA fee schedule. To date, fee structures have been developed and implemented by other municipalities in Ontario to cover the additional costs related to the CLI-ECA processes. Administration is currently reviewing this information with a view to recommending a CLI-ECA fee within the Town's Fees & Charges By-law.

Next Steps

- Develop an implementation plan and identify roles and responsibilities for administering the program with required staffing capacities.
- Designate the Director Public Works and Engineering Services, as the Town's representative for the purposes of signing and submitting the necessary CLI-ECA applications for sanitary collection system and stormwater management system to the MECP and the necessary delegations of authority to the appropriate staff related to the CLI-ECA applications and the administration of the CLI-ECAs.
- Develop and recommend a CLI-ECA related fee structure to recover costs associated with fulfilling requirements for developer application scenarios.
- Review additional resource requirements during the transition period.

Consultations

Development Services
Financial Services
Ministry of the Environment, Conservation and Parks

Financial Implications

The operational impacts of MECP downloading the CLI-ECA process are expected to result in operational changes as well as increased financial commitments. Expenses may include staffing, technology, training and external consultants or service delivery agencies (such as OCWA) to manage CLI-ECA requirements.

The development of new and upgraded processes for inspection, monitoring, operations, maintenance, and reporting may also result in additional costs. This will be

better understood as the required operational, maintenance and monitoring procedures/manuals are developed and as Town staff progresses through the transition period. Associated expenses to be absorbed by the Town will be included in future operating budget reports.

Administration will also review implementing a CLI-ECA Fee as part of the Fees & Charges By-law, which will offset the cost to the general tax base.

Link to Strategic Priorities

Applicable	2023-2026 Strategic Priorities
<input checked="" type="checkbox"/>	Sustainable Growth: Achieve prosperity and a livable community through sustainable growth.
<input type="checkbox"/>	Community Health and Inclusion: Integrate community health and inclusion into our places and spaces and everything we do.
<input checked="" type="checkbox"/>	Service Experience: Enhance the experience of Team Tecumseh and our citizens through responsive and respectful service.

Communications

Not applicable

Website

Social Media

News Release

Local Newspaper

This report has been reviewed by Senior Administration as indicated below and recommended for submission by the Chief Administrative Officer.

Prepared by:

Joseph Lappalainen, E.I.T.
Project Technician

Reviewed by:

John Henderson, P.Eng.
Manager Engineering Services

Reviewed by:

Brian Hillman, MA, MCIP, RPP
Director Development Services

Reviewed by:

Tom Kitsos, CPA, CMA, BComm
Director Financial Services & Chief Financial Officer

Reviewed by:

Phil Bartnik, P.Eng.
Director Public Works & Engineering Services

Recommended by:

Margaret Misek-Evans, MCIP, RPP
Chief Administrative Officer

Attachment Number	Attachment Name
1	Tecumseh Sanitary Sewer System Approved CLI-ECA (#040-W601)
2	Tecumseh Stormwater Management System Approved CLI-ECA (#040-S701)