



Environmental Protection Operations Directorate
Prairie & Northern Region
5019 52nd Street, 4th Floor
P.O. Box 2310
Yellowknife, NT X1A 2P7

ECCC File: 5200 000 019/002
IWB File: N7L3-1531

November 9, 2017

Via email to: semmlerm@inuvwb.ca

Mary Semmler
Executive Director
Inuvialuit Water Board
P.O. Box 2531
Inuvik, NT X0E 0T0

Dear Mary Semmler:

RE: N7L3-1531 – Hamlet of Sachs Harbour – Type B Water Licence Renewal Application

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Inuvialuit Water Board (IWB) regarding the above-mentioned application and is submitting comments via email as requested by the IWB. ECCC's specialist advice is provided based on our mandate, in the context of the *Canadian Environmental Protection Act*, the pollution prevention provisions of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

The following comments are provided:

Water Licence Application Questionnaire

1. ECCC notes that the submitted Water Licence Application Questionnaire contains insufficient information. Many sections of the questionnaire have not been completed (Section 6, Abandonment and Restoration Program; Section 7, Water Quality Monitoring Program; Section 8, Environmental Assessment and Screening; and Section 9, List of Attachments). The remaining sections have been partially completed and do not provide needed details regarding waste management and monitoring.

ECCC recommends that all sections of the Water Licence Application Questionnaire be completed. Outstanding information includes, but is not limited to detailed site maps, drawings of facilities, an operational contingency plan for waste control system components, a description of wastes generated by the Water Treatment Plant (ex. backwash water), monitoring and management of Water Treatment Plant backwash water. If applicable, a detailed system description and waste management procedures for the Wastewater Treatment System and Solid Waste Disposal Facility, interim closure and reclamation plans and water quality monitoring program information should also be provided.

Surveillance Network Program

2. Surveillance Network Program (SNP) details should be included in the Operation and Maintenance plans. This information is missing from the current plans.

ECCC recommends that the Operation and Maintenance plans for the Wastewater Treatment System and the Solid Waste Disposal Facility be updated to include relevant SNP program details, including map(s) of SNP stations and waste systems, a description and purpose of SNP stations, SNP monitoring requirements and sampling protocols and analytical methods.

Quality Assurance/Quality Control

3. Quality Assurance/ Quality Control (QA/QC) procedures related to leachate and effluent quality monitoring should be included in the Operation and Maintenance plans to order to identify and address issues that could affect the quality of the results.

ECCC recommends that the Operation and Maintenance plans for the Wastewater Treatment System and the Solid Waste Disposal Facility be updated to describe relevant QA/QC procedures (including sample blanks, travel/trip blanks, and replicate samples) related to leachate and effluent quality monitoring.

Operation and Maintenance

4. The Wastewater Treatment System Operation and Maintenance Plan lacks detail on how operations and maintenance are carried out in relation to the sewage treatment system.

ECCC recommends that additional detail be provided regarding how operations and maintenance are carried out in relation to the sewage treatment system, or specific references provided if this information is contained in existing documentation.

Record Keeping

5. Section 10 (Record Keeping) of the Wastewater Treatment and System operation and Maintenance Plan indicates there is no recording of spills or unauthorized discharges.

ECCC recommends recording all spills and unauthorized discharges, and reporting these as required to the NT-NU 24-Hour Spill Report Line (867)920-8130.

Landfill Capacity

6. It is unclear whether the available landfill space will be sufficient to meet the projected needs over the next 10 years.

ECCC recommends that Section 7 (Waste Generation and Site Capacity) of the Solid Waste Disposal Facility Operation and Maintenance Plan be completed in order to estimate whether the existing Solid Waste Disposal Facility will be able to accommodate the projected space requirements for the next 10 years. Should the available space be insufficient, ECCC recommends that a plan to manage this scenario be provided.

Solid Waste Management

7. ECCC has recently released the planning and technical guidance document, Solid Waste Management for Northern and Remote Communities. The Proponent is encouraged to use the ECCC planning and technical guidance document to support responsible solid waste management.

A summary and a link to the full document are available on Environment and Climate Change Canada's website at: <http://www.ec.gc.ca/gdd-mw/default.asp?lang=En&n=97182135-1>

Should you require further information, please do not hesitate to contact me at (867)669-4732 or Emily.Nichol@canada.ca.

Sincerely,

[original signed by]

Emily Nichol
Environmental Assessment Coordinator

cc: Bradley Summerfield, Senior Environmental Assessment Coordinator
Georgina Williston, Head, Environmental Assessment North (NT and NU)