



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

ECCC File: 5200 000 012/ 002
IWB File: N5L3-0714

November 9, 2018

Via email at: semmlerm@inuvwb.ca

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

Dear Mardy Semmler:

**RE: N5L3-0714 – Hamlet of Tuktoyaktuk – Type B Municipal 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 Type B Water Licence renewal and is submitting comments via email. ECCC's specialist advice is provided based on our mandate, in the context of the *Canadian Environmental Protection Act*, and the pollution prevention provisions of the *Fisheries Act*.

The following comments are provided:

1. Topic: Closure Plans

Reference: Water Licence Application Questionnaire for Municipal Undertakings – Section 6: Abandonment and Restoration Program.

Comment: ECCC notes that the the Hamlet has deferred development of closure plans for the facilities to the Government of the Northwest Territories (GNWT)

ECCC Recommendation: ECCC recommends retaining the Licence condition requiring closure plans to be submitted in advance of closure for any facility

2. Topic: Spill Contingency plan contact information

Reference:
Spill Contingency Plan for the Hamlet of Tuktoyaktuk Water Licence #N5L3-0714

Comment:

ECCC notes several discrepancies in the contact information provided for ECCC. The regional director is no longer a primary point of contact. The new contact is through the NWT/NU 24 – hour spill report line. Similarly, Table 9 in section 4.2 Off-site Resources should have ECCC removed, as that contact number is also no longer valid.

ECCC Recommendation:

In the case of a spill or emergency, the 24 Hour Northwest Territories Spill Report Line should be contacted first by the Proponent, who will then involve ECCC Emergencies when appropriate.

For information relating to the environmental enforcement and reporting requirements under the Canadian Environmental Protection Act and the Fisheries Act please contact ECCC Environmental Enforcement at 867-669-4730.

The ECCC National Environmental Emergencies Centre (NEEC) will provide technical and scientific environmental advice and assistance to the lead agency, in the event of an environmental emergency. A lead agency is described as the governmental authority that regulates or has authority over the activity from which the emergency originated. NEEC can be contacted at 1-866-283-2333.

3. Topic: Sewage Operations and Maintenance: Sludge management

Reference:

Sewage Disposal Facilities Operation and Maintenance Plan Section 3.3 Sludge Depths and Measurement

Comment:

The plan states that “*at a minimum, once the lagoon cannot receive the entire year’s sewage load and the sewage disposal facility needs to be pumped out more than once per year, a sludge sounding should be conducted in order to determine the sludge levels within the lagoon.*” This method appears to be overly reactive. There are options for the disposal of the sludge, however in order to determine appropriate disposal methods, the sludge must first be characterized. Sludge levels should be periodically measured and removal planned in advance of treatment being compromised.

ECCC Recommendation: ECCC recommends that the Hamlet provide information about sludge management in order to effectively manage the sewage lagoon, and prevent situations where emergency decants become necessary.

4. Topic: Solid Waste Disposal Facility Operations and Maintenance Plan

Reference: Solid Waste Disposal Facility Operations and Maintenance Plan section 6.4 Surface Drainage, of the Solid Waste Disposal Facilities(SWDF) Operation and Maintenance (O&M) Plan (January 25, 2016)

Comment:

This plan lists the water licence conditions regarding removal of site water from the SWDF. However, the O&M Plan does not contain information regarding what contingency measures will be implemented should the site water not meet the water licence discharge criteria.

ECCC Recommendation(s): ECCC recommends that the Solid Waste Disposal Facility Operations and Maintenance Plan be updated to include a section on discharge contingency measures.

5. Topic: Polychlorinated biphenyls (PCBs)

Reference: Solid Waste Disposal Facility Operations and Maintenance Plan

Comment:

Testing of the landfill lagoon includes analysis for PCBs. Results were below detection limits in 2012 and 2017 (SNP 0714-3 not sampled/not reported in other years); unless there is a known source in the landfill this analysis could be reviewed. If analytical data show that this is a consistent result, this requirement for analysis could be removed.

Recommendation:

ECCC recommends a review of the analytical data on PCBs and if appropriate, remove the requirement for analysis.

Should you require further information, please do not hesitate to contact me at (867) 669-4743 or Russell.Wykes@Canada.ca.

Sincerely,

[original signed by]

Russell Wykes
Environmental Assessment Coordinator

cc: Georgina Williston, Head, Environmental Assessment North (NT and NU)