



September 25, 2020

Bijaya Adhikari  
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Inuvialuit Water Board  
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Inuvik, NT X0E 0T0

**Re: Hamlet of Paulatuk (the Hamlet)  
Water Licence Renewal Application – N7L3-1619  
Municipal Water Use and Waste Deposits  
Request for Review and Comments**

Dear Mr. Adhikari,

The Department of Environment and Natural Resources (ENR), Government of the Northwest Territories has reviewed the renewal application at reference based on its mandated responsibilities under the *Environmental Protection Act*, the *Forest Management Act*, the *Forest Protection Act*, the *Species at Risk (NWT) Act*, the *Waters Act* and the *Wildlife Act* and provides the following comment for the consideration of the Board.

**Topic 1: Operation and Maintenance Plan (O&M Plan) – Part 3.1.1. Acceptable Waste, Page 6, Section 3.2. - Signage**

**Comment(s):**

It is stated that a site operator will ensure the acceptability of wastes at the disposal site. However, it does not clarify if the operator will be available at the site during the operational hours of the facility. Furthermore, the signage of a Solid Waste Disposal Facility should normally reflect the actual operational hours. The operational hours or the availability of the operator on-site hasn't been addressed in Section 3.2. or the rest of the report.

**Recommendation(s):**

- 1) ENR recommends that the proponent state the working hours of the facility on the signage, and that the facility be locked outside of operational hours.
- 2) It is also recommended that the operator be available on-site during operational hours. If the operator is on-site only for part of the actual operational hours, this should be detailed in Section 3.1.1.
- 3) ENR recommends the proponent clarify how incoming wastes will meet waste acceptability criteria during hours the operator may not be available at site.

**Topic 2: O&M Plan – Sections 3.1.3. General Household Waste, Page 9**

**Comment(s):**

Point 4, Section 3.1.3. states that pile should be covered daily after compaction with 300 mm thick layer of granular material. On Page 4, under Section 2.2., it states: “household wastes are generally placed in the active cell, and remain unburied”. Under Section 4.10.2, cover material for active disposal area is said to be applied a ‘minimum of once per year, recommended monthly’ for odour and vector control. There is a lack of clarity on how frequently cover is placed on the active cell.

**Recommendation(s):**

- 1) ENR recommends that the proponent clarify the frequency of cover applied on the active cell/disposal area. Ideally, 150 mm cover should be applied on days the waste is received at the facility, according to the *Solid Waste Management for Northern and Remote Communities Planning and Technical Guidance Document* which can be found at the following link:

[http://publications.gc.ca/collections/collection\\_2017/eccc/En14-263-2016-eng.pdf](http://publications.gc.ca/collections/collection_2017/eccc/En14-263-2016-eng.pdf)

- 2) ENR recommends the Hamlet specify the cover material which would be used and its availability. Frequency of cover and compaction are especially important in the summer to reduce vector and odour problems. This will also minimize wind-blown litter and other nuisances.

- 3) If the cover is not applied as frequently as recommended, ENR requests clarification on how the potential vector and odour control challenges will be addressed.

### **Topic 3: O&M Plan - Section 4.8: Compaction and Cover of Wastes**

#### **Comment(s):**

The compaction and cover requirements, as stated by Kent et al. (2003), have been included in the Section. It isn't clear if the Hamlet has access to adequate resources for compaction and cover of the active landfill area.

#### **Recommendation(s):**

- 1) The proponent should identify the resources such as, available cover material, equipment, human resources etc. which are available to meet the requirements and procedures stated in this part of the Plan.
- 2) ENR suggests that Municipal and Community Affairs (MACA), GNWT could be contacted for additional information on funding resources for proper operation and maintenance of the landfill.

### **Topic 4: O&M Plan - Appendix B, SNP Sampling Locations**

#### **Comment(s):**

There are only 2 sampling locations for the runoff from the Solid Waste Disposal Facility. Sampling locations appear to be absent on the south side, despite drainage pathways on the south side. Since the facility is unlined, there should be a robust monitoring program to ensure negative effects to the environment are minimized.

#### **Recommendation(s):**

- 1) ENR recommends that the Hamlet consider the possibility of an additional sampling location on the south of the discussed facility.

### **Topic 5: Wildlife: NWT Listed and Pre-listed Species at Risk**

#### **Comment(s):**

Section 76 and 77 of the *Species at Risk (NWT) Act* requires the Minister of Environment and Natural Resources to make a submission to the body responsible for assessing the potential impacts of a proposed development, or for considering a Land Use Permit or Water Licence application, respecting the

potential impacts of the proposed development, Permit or Licence application on a NWT-listed or pre-listed species or its habitat. NWT-listed species are those that are on the NWT List of Species at Risk. Pre-listed species are those that have been assessed by the NWT Species at Risk Committee (SARC) but have not yet been added to the NWT List of Species at Risk.

The Proponent should be aware that NWT-listed or pre-listed species at risk and their habitat may also be subject to protection under existing sections of the NWT *Wildlife Act*.

As a best practice, ENR encourages the proponent to consider potential impacts, mitigation measures and monitoring requirements for species at risk listed under the federal *Species at Risk Act*, as well as those designated as at risk by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) that may occur in the project area, and the prohibitions that may apply to these species under federal legislation.

The project area overlaps with the ranges of the following NWT-listed and/or pre-listed species; information on these species is available at

<https://www.nwtspeciesatrisk.ca/SpeciesAtRisk>

- [Polar Bear](#) - Special Concern in NWT
- [Barren-ground Caribou \(excluding the Porcupine herd\)](#) – Threatened in the NWT

**Recommendation(s):**

- 1) Although the project overlaps with the range(s) of the species listed above, ENR is of the opinion that the nature, scale, scope, location and timing of the proposed project are such that the likelihood of impacts to NWT-listed or pre-listed species listed above can be avoided or minimized if ENR's wildlife recommendations in this letter are implemented as necessary, as well as the application of any wildlife mitigation and monitoring measures outlined in the Proponent's application and supporting documents.

Comments and recommendations were provided by ENR technical experts in the Environmental Protection and Waste Management Division, the Wildlife and Fish Division and the Inuvik Region and were coordinated and collated by the Environmental Assessment and Monitoring Section (EAM), Environmental Stewardship and Climate Change Division.

Should you have any questions or concerns, please do not hesitate to contact Patrick Clancy, Environmental Regulatory Analyst at (867) 767-9233 Ext: 53096 or email [patrick.clancy@gov.nt.ca](mailto:patrick.clancy@gov.nt.ca).

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Clancy', written in a cursive style.

Patrick Clancy  
Environmental Regulatory Analyst  
Environmental Assessment and Monitoring Section  
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