



September 15, 2016

Mardy Semmler  
Executive Director  
Inuvialuit Water Board  
P.O. Box 2531  
125 Mackenzie Road  
Suite 302, Professional Building  
Inuvik, NT, X0E 0T0

**Re: Hamlet of Ilukhaktok  
Water Licence Application – N7L3-1525  
Draft Municipal Water Licence  
Request for Comment**

The Department of Environment and Natural Resources (ENR), Government of the Northwest Territories (GNWT) has reviewed the document 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 comments and recommendations for the consideration of the Board.

### **Topic 1: General Comment - Track Changes in the Draft Water Licence**

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

The proposed draft Water Licence appears to have numerous changes and edits from the previous 2010 Water Licence. However, a few sections are highlighted which draws the reviewers attention of these items. ENR requests that a draft Water Licence with all tracked changes (including any sections added or removed) be also submitted for review as part of this process. This would allow all reviewers to fully understand the proposed changes.

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

- 1) To assist reviewers, the Board should submit a tracked changes version of the draft Water Licence with the updated terms and conditions. This will ensure any new sections of the draft Licence can easily be identified by the reviewer.

## **Topic 2: References to Draft Plans in Water Licence**

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

Parts of the Draft Water Licence refer to specific sections of the Solid Waste Facility Operation and Maintenance Plan (O&M Plan) and the Sewage Waste Management Plan which include maps or figures. ENR believes it would be best practice to refer to the approved version of the Plan in the Licence rather than the existing section and page number. This will prevent the need to amend the Water Licence if there are any changes to these Plans (page numbers, section numbers, appendices, etc.) during the term of the Licence.

Examples of such include:

- proposed definitions in the Water Licence of “Sewage Waste Disposal Facilities” and “Solid Waste Disposal Facilities”
- Annex A – Section A references to a specific page and paragraph of the Solid Waste Plan for the description of SNP Station 1525-6.

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

- 1) Remove the specific text location references (i.e. “Page 21, Paragraph 2) to the Solid and Sewage Waste Facility Operation and Maintenance Plans from the Water Licence.

## **Topic 3: SNP Locations**

### **Comments:**

The proposed draft Water Licence does not included GPS coordinates for the SNP station locations.

### **Recommendations:**

- 1) ENR recommends the Board or the Hamlet provide GPS coordinates where all SNP will be located in Annex A and update the description for SNP 1525-6 as “Run-off Water diverted from the north end of the solid waste disposal site”.

## **Topic 4: Average Concentration for Faecal Coliforms Definition**

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

The definition for “Average Concentration For Faecal Coliforms” states that the running geometric mean may be any four consecutive results in any single calendar

year. ENR does not agree with this definition as four samples cannot be collected in a calendar year.

**Recommendation(s):**

- 1) ENR recommends the definition be as follows: “means the running geometric mean of up to four consecutive analytical results submitted to the Board in accordance with the sampling and analysis requirements specified in the ‘Surveillance Network Program’”.

**Topic 5: Definition for Contingency Plan**

**Comment(s):**

None.

**Recommendation(s):**

- 1) ENR recommends the definition be as follows: “means a detailed program of action to control and/or minimize the effects of an emergency requiring prompt corrective measures, beyond normal procedures, to protect human life, to minimize injury, to *minimize losses*, and to reduce the exposure of physical assets and the environment to risks resulting from an incident”.

**Topic 6: Parameters for Effluent Monitoring**

**Comment(s):**

The draft Water Licence is proposing EQC monitoring for the parameter Oil and Grease at the compliance SNP Station 1525-2 and for water quality monitoring at the remaining SNP stations. The use of Oil and Grease to monitor and assess petroleum hydrocarbon impacts is an outdated technique, as most programs now utilize the analysis of Total Petroleum Hydrocarbons (TPH).

**Recommendation(s):**

- 1) ENR requests that the monitoring effluent at SNP stations for petroleum hydrocarbons utilize the parameter of Total Petroleum Hydrocarbons (TPH), rather than oil and grease.

## **Topic 7: SNP Monitoring Frequency**

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

Annex A, Part B of the draft Water Licence is proposing SNP sampling twice annually for SNP Stations 1525-2 and 1525-5. ENR requests that the monitoring frequency should be occur once prior to discharge and then monthly during discharge, as this will better align with the updated definition of Average Concentration for Faecal Coliforms discussed above. This is provided for the Board's information to ensure consistency with licensing requirements for similar undertakings in the Northwest Territories.

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

- 1) ENR requests that the monitoring frequency should be occur once prior to discharge and then monthly during discharge.

## **Topic 8: Part D Conditions**

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

None.

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

- 1) ENR requests Condition Number 12 of the Draft Licence (Hazardous Material Disposal Area) be located in the Licence prior to Conditions Number 10 (Notifying the inspector) and 11 (containment of contaminated materials).
- 2) ENR requests Condition Number 16 of the Draft Licence (Temporary Hazardous Material Disposal Area) be located in the Licence prior to Condition Number 12 (Hazardous Material Disposal Area).

Comments and recommendations were provided by ENR technical experts in the Water Resources Division and the Inuvik Region and were coordinated and collated by the Environmental Impact Assessment Section, Conservation, Assessment and Monitoring Division (CAM).

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 Impact Assessment Section  
Conservation, Assessment and Monitoring Division  
Department of Environment and Natural Resources  
Government of the Northwest Territories