



November 10, 2017

Bijaya Adhikari  
Science and Regulatory Coordinator  
Inuvialuit Water Board  
P.O. Box 2531  
125 Mackenzie Road  
Suite 302, Professional Building  
Inuvik, NT X0E 0T0

**Re: Hamlet of Sachs Harbour  
Municipal Water Licence Renewal Application – N7L3-1531  
Municipal Water Usage and Deposits of Waste  
Request for Review and Comments**

Dear Mr. Adhikari,

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

### **Topic 1: Application Not Complete**

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

The municipal Water Licence application submitted is considered to be incomplete and does not contain adequate information to conduct a thorough review of the application. ENR notes that the Inuvialuit Water Board (IWB) deemed the application incomplete in June 2017, and requested the community submit additional information. One of those items was a map of Surveillance Network Program (SNP) monitoring stations (refer to the June 6, 2017 letter from the IWB). ENR understands that information (map) has not been submitted by the Hamlet.

ENR considers the information, discussed above and below, to be critical information required to conduct a satisfactory review of a Municipal Water Licence renewal application. The Water Licence authorizes the use of water and deposit of waste. In order to ensure proper mitigation(s) and protection(s) are in place,

specific information about the location and state of Waste Management Facilities is required.

As the application is not complete, ENR is unable to conduct a satisfactory review of the renewal application, and is unable determine if additional Water Licence Terms and Conditions, or other requirements, are necessary for this municipal Water Licence renewal application and the associated activities.

ENR has identified some key items that are missing from the application. The missing information includes, but is not limited to:

- Section 7 of the Solid Waste Facility Operations and Maintenance Plan (SWF O&M Plan) regarding Waste Generation and Site Capacity was not completed. ENR notes capacity issues were identified in an ENR 2015 inspection report.
- Missing from the Spill Contingency Plan (SCP) is a map showing the location of each facility, as well as any additional community fuel storage locations such as airport fuel facility. On each map, municipal boundaries should be represented, as well as the location of any other hazardous materials stored at each site (p. 46 of 76).
- The name, job title and 24 hour telephone number(s) of staff and/or community member(s) responsible for activating the Spill Contingency Plan at each facility are missing from the SCP (p. 50 of 76). This should include alternate staff, should the regular staff not be available.
- Map showing the location of the Wastewater Sewage Treatment Facility (WWSTF). ENR notes that the WWSTF Operations and Maintenance Plan (WWSTF O&M Plan) identifies that treated wastewater is discharged to a natural wetland (Section 7), that there is a natural channel outflow/stream and/or wetland from natural lake lagoon and coordinates of the final discharge point (Section 11). This information cannot be reviewed, or verified, without a depiction of these areas. ENR notes that Section 1 of the WWSTF O&M Plan/template suggests a map is attached (p. 3 of 76).
- Map showing the location of the Solid Waste Facility (SWF). Rationale for a map is similar to the above. Again ENR notes that Section 1 of the SWF O&M Plan/template suggests a map is attached (p. 16 of 76).
- Drawing showing the Surface Water Management location. Section 14 of the SWF O&M Plan/template indicates a map is attached (p. 29 of 76).
- In addition to the above, there were several Sections that were left blank (e.g. SWF O&M Plan Section 13 on Litter and Wildlife Control, SCP Section 2.6 on Emergency Phone & Radio Locations, etc.)

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

- 1) ENR recommends the Hamlet of Sachs Harbour (the Hamlet) submit all the above information, and a complete application be submitted, in order to allow

ENR reviewers to properly assess the application and make informed recommendations on Terms and/or Conditions to be included in the renewed Water Licence. ENR notes that these submissions are minimum requirements, and the application should include useful and complete information to assist ENR reviewers in commenting on water usage, waste handling, and waste management and disposal.

- 2) ENR recommends that the IWB consider amending the Water Licence to extend the expiry date. This will provide the Hamlet with additional time to prepare and submit maps, complete plans and collect additional information as will be required to submit a complete application to the IWB for review purposes.
- 3) ENR recommends, once the Hamlet submits a complete application, that the renewal application be forwarded to reviewers again for a full regulatory review.

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 Assessment and Monitoring Section (EAM), Conservation, Assessment and Monitoring 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,



Patrick Clancy  
Environmental Regulatory Analyst  
Environmental Assessment and Monitoring Section  
Conservation Assessment and Monitoring Division  
Department of Environment and Natural Resources  
Government of the Northwest Territories