



## Inuvialuit Land Administration

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October 1, 2012

Northwest Territories Water Board  
P.O. Box 2531  
125 Mackenzie Road  
Suite 302, Professional Building  
Inuvik, NT X0E 0T0

**ATTN: Mike Harlow**  
Executive Director  
harlowm@nwtwb.com

Dear Mr. Harlow:

**RE: Review of Renewal Application for Sachs Harbour Municipal Water Licence N7L3-1531**

The Inuvialuit Land Administration (ILA) would like to thank you for the opportunity to comment on Municipal Water Licence N7L3-1531 – Sachs Harbour.

As you are aware, the ILA is the land manager of Inuvialuit Private Lands adjacent the Hamlet Sewage Lagoon, Solid Waste Disposal Facility (SWDF), and Water Lake. It is therefore in the ILA's interest that the operations associated with the above lands are managed and carried out in a manner that is favorable to Hamlet Lands, as well as the adjacent Inuvialuit Private Lands.

In particular, proper testing and management of discharge from the sewage lagoon and runoff from the SWDF would ensure that potential contamination of adjacent lands is avoided. Additionally, the proper utilization of waste segregation, fencing, and disposal methods at the SWDF is in the best interest of all parties.

If you have any questions or require further clarification, please contact the ILA office.

Best Regards,

Shawna Wilson  
Environmental Management Coordinator  
Inuvialuit Land Administration  
Direct Office Tel: (867) 977-7104  
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Mike

I have reviewed the application and supporting documentation. Based on my most recent inspection of the Water Treatment Plant, Solid Waste Disposal Site I cited the following violations which if not yet addressed should be attached to the license renewal as items requiring rectifying:

Water Treatment Plant

Raw water sampling port required (must be sited at a point preceding any chlorination or filtration)

Corrosion around 11 of 12 valves must be removed and valve handles refinished

Back-up chlorination required.

A method for de-chlorinating water that has been shocked during cleaning and disinfecting processes must be available: compound Vita-chlor is commonly used-safe no-hazardous product

Both heat trace cables must be operational-one, only, was functioning at the time of inspection

Water Treatment Plant operator should be engaged on a training/work experience path to certification

Solid Waste Disposal Site

Signage indicating types and segregation of waste not conspicuous

Metal/wood mixed with domestic waste

Quantity of waste extant outside fenced area

Fence not continuous and no functional gate

Sewage Lagoon

Earth had eroded near chute entrance: Soil/gravel must be deposited to ensure a stable sufficient platform to accommodate the truck while discharging and lower the risk spillage on the ground.

The most recent assessment was conducted on July 24<sup>th</sup>, 2012 so some or all of the violations cited may have been addressed.

Thanks

Robert Savoury  
Environmental Health Officer  
Population Health  
Department of Health and Social Services  
Government of Northwest Territories  
Box 1980, Inuvik, NT X0E0T0  
Tel 867-777-7250/Fax 867-777-3255  
Email: Robert\_Savoury@gov.nt.ca/www.hlthss.gov.nt.ca

Mike

This would be related to the water treatment plant. Currently our guidance is that water supply system operators submit apart from the minimum four treated samples per month one raw water sample. Currently in Sachs Harbour there is no place to draw a raw water sample, a

sample upstream of any disinfection or filtration. It requires that a sampling port “ a tap of some sort” be installed to facilitate this-a flow valve that can be opened and closed.

Hope this clarifies.

Bob

**From:** Mike Harlow [mailto:harlowm@nwtwb.com]

**Sent:** Monday, October 29, 2012 11:10 AM

**To:** Robert Savoury

**Subject:** RE: License N7L3-1531 Sachs Harbour Renewal

Hello Robert,

Thank you for your email below. I have a question of clarification based on your comments below.

Cheers,

Mike

Raw water sampling port required (must be sited at a point preceding any chlorination or filtration) – Could you provide more detail as to what a ‘raw water sampling port’ is? Would the requirement in the current licence Surveillance Network Monitoring program for a monitoring station at location 1531-1 “Raw water supply” alleviate this concern?



Northwest  
Territories Environment and Natural Resources

October 31, 2012

Mr. Mike Harlow  
Executive Director  
Northwest Territories Water Board  
P.O. Box 2531  
Inuvik, NT  
X0E 0T0

Dear Mr. Harlow,

**Re: Hamlet of Sachs Harbour  
Water Licence Application – N7L3-1531  
Request for Review and Comments**

The Department of Environment and Natural Resources (ENR) has reviewed the above application based on its mandated responsibilities under the *Environmental Protection Act*, the *Forest Management Act*, the *Forest Protection Act* and the *Wildlife Act* and provides the following comments and recommendations.

## **TOPIC 1: OPERATIONS AND MAINTENANCE PLAN**

### **Comment(s)**

As part of the current water license, the Hamlet of Sachs Harbour is required to submit an Operations and Maintenance Plan (O&M Plan) for their solid waste facility by June 30, 2012. ENR notes that no O&M Plan has been submitted. The purpose of this plan is to assist community staff in the proper operation and maintenance of their solid waste facility. The Department of Municipal and Community Affairs (MACA) developed a document called, *Guideline for the Planning, Design, Operations and Maintenance of Modified Solid Waste Sites in the Northwest Territories*<sup>1</sup> in 2003 that will be helpful for the Hamlet when developing an O&M Plan. For specific guidance on the development of an O&M Plan, consult the *Guidelines for the Preparation of an Operation and Maintenance Manual for Sewage and Solid Waste Disposal Facilities in the Northwest Territories*<sup>2</sup>.

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<sup>1</sup> Municipal and Community Affairs. 2003. *Guideline for the Planning, Design, Operations and Maintenance of Modified Solid Waste Sites in the Northwest Territories*.

<sup>2</sup> Municipal and Community Affairs. 1996. *Guideline for the Preparation of an Operation and Maintenance Manual for Sewage and Solid Waste Disposal Facilities in the Northwest Territories*.

## **Recommendations**

1. ENR recommends that the Hamlet develop an O&M Plan and submitted to the Board for its approval. It should be noted that the water licence also requires an O&M Plan for the sewage waste disposal facility.
2. The Hamlet should consult the *Guideline for the Planning, Design, Operations and Maintenance of Modified Solid Waste Sites in the Northwest Territories* and the *Guidelines for the Preparation of an Operation and Maintenance Manual for Sewage and Solid Waste Disposal Facilities in the Northwest Territories* in developing this plan.
3. And, once this plan is developed, ENR recommends that it is made available to any staff, operators, and/or contractors performing any functions related to the management of the SWF, and that the Plan is followed.

## **TOPIC 2: HAZARDOUS WASTE**

### **Comment(s)**

The water license application states that hazardous wastes are not accepted at the municipal landfill. The inspection reports show the presence of drums and also mentions the presence of contaminated soil. Typically the following hazardous wastes, in various quantities, are encountered in municipal solid waste facilities throughout the NWT:

- Asbestos
- Batteries (Lead Acid)
- Glycols (Antifreeze, Heating Fluid)
- Heating Oil Tanks
- Household Hazardous Waste
- Hydrocarbon Contaminated Soil/Snow/ Water
- Mercury Containing Materials
- Oil Debris
- Old Fuel
- Refrigeration Equipment, Ozone Depleting Substances
- Paint
- Propane Tanks
- Residue fuel tanks/drums
- Used Oil
- Vehicles Containing Batteries, Fluids, Mercury Switches

These hazardous wastes are generated by residents as well as the Industrial, Commercial, and Institutional Sector (these combined are commonly referred to as the ICI Sector). However, it is not the responsibility of the Hamlet of Sachs Harbour to manage hazardous waste from the ICI Sector.

**Recommendation(s)**

1. ENR recommends that the Hamlet build on the hazardous waste management plan that was started in August 2011 at the Hazardous Waste Workshop facilitated by the NWT Water Board in Inuvik. The Environment Division has kept notes from that workshop and can be contacted to continue this work.
  
2. For the purpose of facilitating hazardous waste removal, ENR recommends that Hamlet staff complete a detailed inventory of hazardous waste in Sachs Harbour, in a chart similar to the one below.

TYPE OF WASTE	TYPE OF CONTAINER	QUANTITY	SIZE

**TOPIC 3: CLOSURE AND RECLAMATION**

**Comment(s)**

ENR understands that the Hamlet is required to submit a closure and reclamation plan six months prior to the closure of their solid waste facility to the NWT Water Board for approval. However, it is important to think about the facility’s closure much earlier in the process so that progressive reclamation can take place during the life of the facility. There are three distinct steps in closure and reclamation planning:

1. Preliminary Closure and Reclamation Plan
2. Interim Closure and Reclamation Plan
3. Final Closure and Reclamation Plan

Step 1, a Preliminary C&R Plan, is appropriately prepared in conjunction with the planning and permitting stage of the solid waste facility. The general purpose is to propose closure objectives, alternatives analysis, and proposed closure criteria to understand the Proponent's intent. Determining appropriate closure options should also be integrated with a level of community engagement to build consensus upfront.

Step 2, the Interim C&R Plan, is to identify uncertainties surrounding certain closure options that guide corresponding areas for reclamation research during operations prior to closure. There are typically several versions that are prepared during the life of the facility to address changes in development alternatives, and to refine as the facility progresses towards closure and subsequent versions of closure and reclamation Plans are produced. Interim Plans are prepared on a regular basis to coincide with operational changes, advances in technology, key milestones, information collected during reclamation research, and results of community engagement.

Step 3, the Final C&R Plan, should be more detailed because more information and studies are available to determine duration, frequency, and magnitude of the effects. The final version of the C&R Plan is to contain detailed reclamation activities, and should be prepared and approved prior to a scheduled permanent closure or immediately after an unplanned closure.

### **Recommendation(s)**

1. ENR recommends that the Hamlet prepare and submit an Interim Closure and Reclamation Plan for the current solid waste facility.

### **TOPIC 4: BURNING OF WASTE**

ENR notes that Part D (10) of the current water license prohibits the open burning of solid waste with the exception of paper products, paperboard packaging and untreated wood. Despite this condition, it appears that open burning of unsegregated municipal waste is being conducted at the solid waste facility. Specifically, bullet 8 of the Aboriginal Affairs and Northern Development Canada (AANDC) Inspection report indicates that evidence of waste burning was present throughout the waste cell, despite SAO testimonial that the practice no longer occurs, and the Additional Application Information also indicates that the Hamlet burns domestic garbage (i.e. bagged garbage and cardboard material).

The open burning of waste produces and releases numerous toxic pollutants to the air, such as dioxins and furans, polycyclic aromatic hydrocarbons (PAHs), and other persistent organics, which lead to direct and indirect hazards to human and environmental health. The ash and residue from waste burning may also contain numerous toxic compounds which have additional environmental implications. ENR

does not support the open burning of waste, other than clean paper, cardboard and untreated wood.

Since the community continues to conduct open burning at the solid waste facility, ENR recommends that an O&M Plan be developed to include clear documentation and demonstrated understanding of the planned and permitted practices to be carried out at the solid waste facility for its standard operations, and conversely, make clear note of the practices which are specifically not permitted. Hamlet officials should be trained on the contents of the O&M Plan. The O&M Plan should include preventative measures such as education and awareness campaigns and signage, and measures for dealing with any incidents of burning at the solid waste facility such as immediate extinguishing of any fires, prompt reporting to AANDC inspectors and the NWT Spill Line, and reprisal as necessary.

### **Recommendation(s)**

1. ENR recommends that the Part D (10) of the current water license be renewed, which prohibits the open burning of waste other than paper products, paperboard packaging and untreated wood.
2. ENR further recommends that an O&M Plan be developed which includes preventative measures and management actions for incidences of unpermitted open burning of waste.

Comments and recommendations were provided by ENR technical experts in the Environment Division and the Inuvik Region and were coordinated and collated by the Environmental Assessment and Monitoring Section (EAM).

Should you have any questions or concerns, please do not hesitate to contact Patrick Clancy, Environmental Regulatory Analyst at 920-6118 or [patrick\\_clancy@gov.nt.ca](mailto:patrick_clancy@gov.nt.ca).

Sincerely,



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





Environmental Assessment North  
Environmental Protection Operations (EPO)  
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October 31, 2012

EC File: 4782 038  
NWTWB File: N7L3-1531

Mike Harlow  
Executive Director  
Northwest Territories Water Board  
PO Box 2531  
Inuvik, NT X1A 2N9

Via email: [harlowm@nwtwb.com](mailto:harlowm@nwtwb.com)

**RE: Renewal for Sachs Harbour Municipal Water Licence N7L3-1531**

Environment Canada (EC) has reviewed the above-mentioned renewal application and supporting materials submitted to the Northwest Territories Water Board (NWTWB). The following specialist advice has been provided pursuant to 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 Hamlet of Sachs Harbour (the Hamlet) is applying to the NWTWB to renew its municipal water license N7L3-1531. The water license includes the raw water supply, the community sewage lagoon, and the community solid waste disposal facility. Challenges with the operation of systems and non-compliance issues are well documented in the various reports and include all aspects of sampling and reporting, submission of plans, hazardous waste management, spill preparedness and reporting, and some aspects of solid waste management.

Upon review of the renewal application, EC provides the following comments for the NWTWB's consideration:

**General**

- Subsection 36(3) of the *Fisheries Act* specifies that, unless authorized by federal regulation, no person shall deposit or permit the deposit of deleterious substances of any type in water frequented by fish, or in any place under any conditions where the deleterious substance, or any other deleterious substance that results from the deposit of the deleterious substance, may enter any such water. In the definition of deleterious substance (Section 34(1), the *Fisheries Act* includes "any water that contains a substance in such quantity or concentration, or that has been so treated, processed or changed, by heat or other means, from a natural state that it would, if added to any other water, degrade or alter or form part of a process of degradation or alteration of the quality of that water so that it is rendered or is likely to be rendered deleterious to fish or fish habitat or to the use by man of fish that frequent that water." Subsection 36(3) makes no allowance for a mixing or dilution zone at the point of deposit.

### **Surveillance Network Program (SNP)**

- The Hamlet has not been meeting sampling requirements outlined in the SNP license requirements. EC recommends that the Hamlet train qualified individuals for the collection of samples as well as identify a laboratory able to process the samples. Without regular sample collection and analysis, problems with the system performance won't be recognised and addressed, and discharges to the environment could be of unacceptable quality.

### **Water Supply and Landfarm**

- EC notes that the land farm containment cell is in close proximity to the water source, Water Lake. Wind-blown hydrocarbon-contaminated soil and dust from erosion at the land farm cell could potentially enter Water Lake. EC recommends that the Hamlet follow recommendations outlined in the AANDC inspection reports (monitoring throughout the winter months and ensuring exposed soil is secure in order to prevent erosion). Also, when grading the road near the lake, the Hamlet should ensure the graded material does not come in contact with the drainage to the lake, to prevent potential contamination of Water Lake.

### **Waste and Waste Disposal**

- The Hamlet states that it burns domestic material, i.e., bagged garbage and cardboard materials. Open burning of municipal waste is strongly discouraged by EC, as this results in the formation and spread of some extremely toxic compounds, as well as the generation of fine particulate matter due to incomplete combustion of household materials. Raw sewage should not be burned as it is unlikely that raw sewage would be completely combusted and could lead to the release of pathogens into the environment.
- EC recommends the use of an approved incinerator for the disposal of combustible wastes. EC has developed a Technical Document for Batch Waste Incineration, and is available at the following web link:  
<http://www.ec.gc.ca/gdd-mw/default.asp?lang=En&n=F53EDE13-1>  
The technical document provides information on appropriate incineration technologies, best management and operational practices, monitoring and reporting. This information should be incorporated into an incineration management plan for the hamlet.
- Solid wastes that are conditionally suitable for open burning are paper products, paperboard packaging and untreated wood. Plywood, painted wood or other treated wood should not be disposed of in this manner. All residual waste from the burning should be thoroughly collected, removed, and disposed in an appropriate manner. For reference, below is a link that provides information from EC regarding open burning:  
[http://www.ec.gc.ca/gdd-mw/684B44DD-5780-4F73-BC58-A97E31A19EDC/COM1170\\_Open\\_Burning\\_Brochure\\_e\\_v6\\_for%20web.pdf](http://www.ec.gc.ca/gdd-mw/684B44DD-5780-4F73-BC58-A97E31A19EDC/COM1170_Open_Burning_Brochure_e_v6_for%20web.pdf)
- The Hamlet also states in the renewal application that it does not currently collect hazardous waste, i.e. oil, waste oil, batteries, etc. EC recommends that the proponent segregate hazardous wastes, including batteries and waste oil, from the general waste stream and ensure that all hazardous wastes, including waste oil, are disposed of at an approved facility. Such wastes should be segregated and contained such that contaminants do not migrate from the landfill in drainage (leachate) and enter surface waters.

### **Spill Contingency Planning and Reporting**

- EC notes that the Hamlet has provided spill kits in areas of fuel transfer. EC suggests that protective clothing and clean up supplies similarly be on hand in the event of a sewage spill and these items should be maintained in a convenient location which is readily accessible in the event of an emergency.
- In the Spill Contingency Plan, the EC contact information should be removed (see following comment). Periodic review of contact information for Hamlet operations staff should also be done, with updates as necessary to keep the plan current.
- Please note that according to the Aboriginal Affairs and Northern Development Canada's (AANDC) *Guidelines for Spill Contingency Planning* (April 2007), all releases of harmful substances, regardless of quantity, are to be reported to the NWT / NU 24-hour Spill Line,

(867) 920-8130 if the release is near or into a water body, is near or into a designated sensitive environment or sensitive wildlife habitat, poses imminent threat to human health or safety, poses imminent threat to a listed species at risk or its critical habitat, or is uncontrollable. In the event of an environmental emergency, EC's focal point for coordination and provision of science and technical advice (including spill modelling) during a response will originate from the National Environmental Emergencies Centre (NEEC) in Montreal via notification through the appropriate territorial/provincial spill line.

- Monitoring of the fuel storage areas should be done on a regular basis to avoid spills.

EC notes that there have been ongoing compliance issues but commends the Hamlet for taking steps to address these issues and address deficiencies, specifically those noted by AANDC inspections.

If there are any changes in operations EC should be notified as further review may be necessary. Please do not hesitate to contact the undersigned with any questions or comments with regards to the foregoing at (867) 975-4631 or by email at [Paula.C.Smith@ec.gc.ca](mailto:Paula.C.Smith@ec.gc.ca)

Yours truly,



Paula C. Smith  
A/Senior Environmental Assessment Coordinator

cc: Carey Ogilvie (Head, Environmental Assessment-North, EPO, Yellowknife, NT)  
Ron Bujold (Environmental Assessment Officer, EPO, Edmonton, AB)  
Anne Wilson (Head, Water Quality, EPO, Edmonton, AB)



**Aboriginal Affairs and  
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File: N7L3-1531

October 31, 2012

**Mike Harlow**  
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Northwest Territories Water Board  
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Inuvik, NT X0E 0T0

Fax: 867-678-2943

**Re: Renewal for Sachs Harour Municipal Water Licence N7L3-1531 – October 2012.**

Aboriginal Affairs and Northern Development Canada – Water Resources Division (AANDC) has reviewed the Hamlet of Sachs Harbour Water Licence renewal. AANDC provides the attached comments in the Comment Table format.

Thank you for providing AANDC with the opportunity to comment on the above application. If you have any questions or concerns, please feel free to contact Jeanne Arsenault at 867-669-2658 or [Jeanne.Arsenault@aandc.gc.ca](mailto:Jeanne.Arsenault@aandc.gc.ca), or Jan Davies at 867-777-8909 or [Jan.Davies@aandc-aadnc.gc.ca](mailto:Jan.Davies@aandc-aadnc.gc.ca).

Regards

Conrad Baetz  
Manager, North MacKenzie District  
Aboriginal Affairs and Northern Development Canada

**GENERAL INSTRUCTIONS FOR EXCEL TEMPLATE:**

1. Do not leave blank rows above or between comments.
2. Do not modify the instructions or the column headings (i.e. the top three rows).
- 3. Each comment must have an associated recommendation.**
4. All formatting will be lost when this file is uploaded to the Online Comment Table.
5. If necessary, adjust the cell width and height in order to view all text.
6. Cutting and pasting comments from WORD documents cannot include hard returns (spaces between paragraphs).
7. If you would like to create paragraphs within a single cell, please use a proper carriage return (ALT & ENTER).

**App #: N7L3-1531**

**Review of: Hamlet of Sachs Harbour Water Licence Renewal**

**Reviewing Agency: Aboriginal Affairs and Northern Development Canada**

**Date: October 26th, 2012**

<u>TOPIC</u> <i>Be as specific as you think is appropriate; for example a section or page of the document, a recommendation #, general comment, etc.</i>	<u>COMMENT</u> <i>Comments should contain all the information needed for the proponent and the Board to understand the rationale for the accompanying recommendation.</i>	<u>RECOMMENDATION</u> <i>Recommendations can be for the proponent or for the Board. Recommendations should be as specific as possible, relating the issues raised in the "comment" column to an action that you believe is necessary.</i>
<b>Containment/treatment of Contaminated Soils</b> Conditions applying to Waste Disposal	The most recent inspection report conducted by an AANDC inspector notes the importance of proper contaminated soil management. The Hamlet is currently not equipped to store (no liner) or treat (no treatment facility) contaminated soils.  AANDC is therefore not clear why excavated contaminated soil from an old POL tank farm spill was accepted at the SWDF. The Hamlet should further consider any future need for disposal of hydrocarbon contaminated soils within the community due to spills, etc.	The Hamlet of Sachs Harbour should immediately plan for proper management of existing and future contaminated soils, in order to minimize environmental risks and liability.  AANDC recommends the Hamlet consider available contaminated soil management options, which could include constructing a landfarm/biopad treatment facility or, at a minimum, a lined containment cell where contaminated soils could be temporary stored pending removal to an acceptable location. These recommendations are reflected in proposed wording amendments described below.

<p><b>Safe containment of contaminated soils</b> Conditions applying to Waste Disposal - Contaminated Soil</p>	<p>As described in above comment, hydrocarbon contaminated soils should be managed properly.</p>	<p>AANDC recommends the following condition be added to Part D, of the water licence relating to waste disposal: "The Licensee shall segregate and store hydrocarbon contaminated soils in a designated area, to the satisfaction of an Inspector".</p>
<p><b>Water Licence Renewal</b> Hazardous Wastes Management</p>	<p>The Hamlet's 2011 Annual Report states that only domestic waste was accepted and that no hazardous waste was received at the solid Waste Disposal Facility (SWDF) in 2011. The most recent inspection report however indicate non-compliance surrounding the segregation and storage of hazardous wastes at the SWDF.</p> <p>To adequately assist the Hamlet with the management of hazardous waste, AANDC recommends that a Hazardous Waste Management Plan be developed and implemented either as part the SWDF Operation and Maintenance (O&amp;M) Plan, or as a stand alone document. Once completed, this plan will help both the SWDF staff and the Sachs Harbour's population to recognize which of the following materials will, or will not, be accepted at the SWDF: Asbestos; Batteries</p>	<p>A Hazardous Waste Management plan will greatly assist the Town in clarifying/determining hazardous wastes management policies and procedures at the SWDF.</p> <p>AANDC recommends the Hamlet's water licence contain a condition for the establishment of a Hazardous Waste Management Plan, either as a section of the SWDF O&amp;M Plan (Part E - Item 3), or as separate condition of Part D - Conditions Applying to Waste Disposal.</p>

<p><b>Safe containment of Hazardous Wastes</b> Conditions applying to Waste Disposal</p>	<p>As noted in the general comments above, hazardous waste should be stored in a designated, contained area at the SWDF to prevent further contamination and best practices.</p>	<p>AANDC recommends the following wording for Part D, Item 9: "The Licensee shall segregate and store hazardous Waste in a <b>designated, contained</b> temporary storage area, to the satisfaction of an Inspector"</p>
<p><b>Water licence Part A</b> Scope and Definitions</p>	<p>Additional definitions are required for clarity.</p>	<p>AANDC recommends the Scope and Definitions part of the reviewed water licence to be updated to include the following definitions:</p> <ul style="list-style-type: none"> <li>* Freeboard means the vertical distance between the Water line and the lowest elevation of the effective Water containment crest on a dam;</li> <li>* Engineer means a professional engineer registered to practice in the Northwest Territories in accordance with the Engineering and Geosciences Act, S.N.W.T. 2006, c.16; &amp;</li> <li>* Water Use means the use of Water as defined by section 2 of the Northwest Territories Waters Act and shall include freshwater from all sources.</li> </ul>

<p><b>Water licence Part B, Item 1</b> Annual Reporting</p>	<p>Wording should be updated for clarity:</p>	<p>AANDC recommends the described additions to be included in order to bring further clarification and details to the current water licence:</p> <p>Part B, Item 1 b) should read: "the monthly and annual quantities of each and all Wastes discharged, <b>including sewage discharged into the Sewage Disposal Facilities;</b>".</p> <p>Part B, Item 1 d): "the monthly and annual quantities of solid waste (e.g. sludge)...", solid waste should be replaced by "<b>sewage solids</b>".</p> <p>As well, while the licence requires a tabular summaries of lab data, a copy of originals lab results should also be provided.</p>
<p><b>Water licence Part B, Item 4</b> map</p>	<p>SNP AANDC recommends GPS coordinates to be added to the SNP map in order to allow for undisputable sampling location tracking at all times.</p>	<p>Item 4 of the licence General Conditions (Part B) should read as followed: "...submit to the Board for approval a map or drawing indicating the location of all Surveillance Network Program sampling stations, with associated GPS coordinates.</p>



<p><b>Water Licence Part C, Item 4</b> Fish Screens</p>	<p>The following condition appears with in the Water Licence: "The Water intake hose used on the water pumps shall be equipped with a screen with a mesh size sufficient to ensure no entrainment of fish (2.54mm)." The use of fish screens does not apply to the Northwest Territories Water Act and nor the mandate of the Northwest Territories Water Board. This is a fisheries related issue. This condition is inconsistent with the other municipal Water Licences issued by the NWTWB which no longer have conditions applying to fish screens.</p>	<p>This condition should be removed from the Water Licence.</p>
<p><b>Water licence Part D</b> Conditions applying to Waste Disposal</p>	<p>Contaminated snow is often encountered in communities and is often disposed at the local landfill. The licence should account for this potential at the Sachs SWDF.</p>	<p>Part D, Item 7 &amp; 8 should also include Contaminated snow when referring to contaminated soil, and therefore read as followed: "The Licensee shall notify an Inspector when any contaminated soil or <b>contaminated snow</b> is being accepted at the Solid Waste Disposal Facilities", and "The Licensee shall contain all contaminated soil <b>or contaminated snow</b> in such a manner as to minimize the potential for migration of contaminants into any Waters, to the satisfaction of an Inspector."</p>

<p><b>Water licence Part E</b> Conditions applying to Operation and Maintenance</p>	<p>A Spill Contingency Plan was recently submitted by Sachs Harbour. Therefore, Part E, Item 1, should be removed entirely. Instead, a new section representing <b>Conditions Applying to Spill Contingency Planning</b> should be added to the water licence.</p>	<p>AANDC recommends that a section relating to <b>Conditions Applying to Spill Contingency Planning</b> be added to the water licence, and include the following:</p> <p><i>* The Licensee shall review the Contingency Plan annually and modify the plan as necessary to reflect changes in operation and technology. Any proposed modifications shall be submitted to the Board for approval.</i></p> <p><i>* If, during the period of this Licence, an unauthorized discharge of Waste occurs, or if such a discharge if foreseeable, the Licensee shall:</i></p> <p><i>a) Employ the appropriate Contingency Plan;</i></p> <p><i>b) Report the incident immediately via the 24-hour NWT Spill Report Line. Currently the number is (867) 920-8130; and</i></p> <p><i>c) Submit to an Inspector a detailed report on each occurrence.</i></p>
<p><b>Water licence Part E</b> Conditions applying to Operation and Maintenance</p>	<p>Part E, Item 2 of the water licence refers to components that should be included within a Sewage Treatment Plan.</p>	<p>AANDC recommends Part E, 2 c) to also include the following: "sludge management program at the Sewage Treatment Facility including the quantity of sludge generated, <b>frequency of removal from the lagoon and the disposal procedures used.</b> "</p>

<p><b>Water licence Part E</b> Conditions applying to Operation and Maintenance</p>	<p>Part E, Item 3 refers to a <i>Municipal Solid Waste Operations and Maintenance Plan</i> to be prepared in accordance with the <i>Guideline for the Planning, Design, Operations and Maintenance of Modified Solid Waste Sites in the Northwest Territories, April 2003</i>, developed for The Department of Municipal and Community Affairs, Government of the Northwest Territories. AANDC recommends the plan include, but not limited to, the following:</p> <ul style="list-style-type: none"> <li><b>a) A description of how facilities are operated and maintained, including:</b> <ul style="list-style-type: none"> <li><i>i. How often the tasks are performed; and</i></li> <li><i>ii. The personal responsible for their completion;</i></li> </ul> </li> <li><b>b) Details about the maintenance of the fence around the Solid Waste Disposal Facility;</b></li> <li><b>c) Frequency of inspection of dams, dykes, and drainage courses;</b></li> <li><b>d) Removal of floating material from Sewage Disposal Facilities;</b></li> <li><b>e) Control of effluent discharge quality;</b></li> <li><b>f) Runoff and drainage control within and around the facility and restoration of erosion;</b></li> <li><b>g) Treatment of contaminated drainage;</b></li> <li><b>h) Prevention of windblown debris;</b></li> <li><b>i) Segregation of domestic, metal, and recyclable Waste materials;</b></li> <li><b>j) Method and frequency of site maintenance including burning where permitted;</b></li> <li><b>k) Alternatives designed to reduce burning; and</b></li> <li><b>l) A Hazardous Waste Management Plan that shall be completed in general accordance with the Guideline for the Planning, Design, Operations and Maintenance of Modified Solid Waste Sites in the Northwest Territories, April 2003.</b></li> </ul>	<p>AANDC recommends the enumerated Solid Waste Operations and Maintenance items to be included within the water licence to offer further guidance.</p>
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