Aboriginal Affairs and Northern Development Canada
http://www.aandc-aadnc.gc.ca

Affaires autochtones et Développement du Nord Canada
http://www.aadnc-aandc.gc.ca

North Mackenzie District
P.O. Box 2100
Inuvik, NT X0E 0T0

Telephone:867-777-8900
Fax: 867-777-2090

September 22, 2011

Northwest Territories Water Board
P.O. Box 2531
Inuvik, NT X0E 0T0

Attn: Freda Wilson, Office and Finance Administrator

RE: Municipal Water Licence N7L3-1531
CLASS B - MUNICIPAL

Dear Ms. Wilson,

Please find the enclosed Inspection Report for your review and/or records.

An electronic copy (un-editable Adobe pdf.) has also been provided by e-mail.

If you have any questions or concerns regarding the enclosed, and/or if additional information is required please contact me at (867) 777-8909.

Sincerely,

Jan Davies
Water Resource Officer

Cc: Conrad Baetz, District Manager, North Mackenzie District, Inuvik, NT

Enclosure: Municipal Water Licence Inspection Report and Cover Letter (7 pages)

What Goes Up Must Come Down - Open Burning of Garbage Is Harmful to Your Health and the Environment Document

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September 22, 2011

Hamlet of Sachs Harbour
General Delivery
Sachs Harbour, NT X0E 0Z0

Attn: Adella Carpenter, Acting - Senior Administrative Officer

RE: Municipal Water Licence N7L3-1531
CLASS B - MUNICIPAL

Dear Ms. Carpenter,

An inspection was conducted of the Municipal Water Supply and Waste Disposal Facilities on September 6, 2011. Enclosed is a copy of the Municipal Water Licence Inspection Report.

The Hamlet is to be commended on their submission of the Annual Report and Spill Contingency Plan in addition to making plans to sample the sewage lagoon and landfill runoff. Unfortunately there remains a number of violations as depicted on page four of the Inspection Report. Some of the violations relate to signage, mapping, and Surveillance Network Program responsibilties and can be dealt with promptly. Please review and address the concerns throughout the Inspection Report.

While it is clear progress is being made on certain issues, however, there are terms and conditions of your Water Licence that are being neglected resulting in non-compliance/violations. Upon review of previous years Inspection Reports it is apparent that many of the remaining violations and concerns outlined in the Inspection Report are consistent with those in previous years. Please address the aforementioned items as non-compliance with the Water Licence is a serious matter.

Please note that it is the Hamlet's responsibility to ensure compliance with all of the terms and conditions of its Water Licence. Aboriginal Affairs and Northern Development Canada looks forward to working with you as much as possible to achieve compliance.

A copy of this report will be sent to the Northwest Territories Water Board for their review and public records.

MUNICIPAL WATER LICENCE INSPECTION FORM

If you have any questions/concerns regarding the enclosed, and/or if additional information is required, please do not hesitate to contact me at (867) 777-8909.

Sincerely,

Jan Davies
Water Resource Officer

Cc: Conrad Baetz, District Manager, North Mackenzie District, Inuvik, NT

Enclosure: Municipal Water Licence Inspection Report (5 pages)
What Goes Up Must Come Down - Open Burning of Garbage Is Harmful to Your Health and the Environment Document

MUNICIPAL WATER LICENCE INSPECTION FORM

LICENCE #:	N7L3-1531	**EXPIRY DATE:**	November 20, 2012
LICENCEE:	Hamlet of Sachs Harbour	**PREVIOUS INSPECTION:**	September 21, 2010
COMPANY REP:	Adella Carpenter	**INSPECTION DATE:**	September 6, 2011

WATER SUPPLY

Source:	Water Lake	Quantity Used:	3,007 m^3
Owner/Operator:	Hamlet of Sachs Harbour	Meter Reading:	N/A

Indicate: A - Acceptable U - Unacceptable N/A - Not Applicable N/I - Not Inspected

Intake Facilities	A[1,4,5]	Storage Structures	A	Treatment Systems	A[2,3]	Recycling	N/A
Flow Meas. Device	A	Conveyance Lines	A	Pumping Stations	A[2,3,4,5,6]	Chem. Storage	A
						Modifications	N/A

Water Supply Comments:

1. The intake line for the Water Treatment Plant is having problems and so the plant is not being operated. Efforts are being made to repair the intake line. There are a variety of solutions being proposed for this. Continued communication with the Northwest Territories Water Board and this office is needed regarding this issue.
2. No sign to inform public of the Water Supply Facility is a violation of Part B: General Conditions, Item 5, of the Water Licence.
3. Hamlet is still on a boil water advisory and drawing water directly by pumps and the water truck from Water Lake then batch chlorinating. Please note that given that the water pump is in close proximity to the water it is critical to avoid any spillage of fuel, oil or potential water leaks from the pump (see Figure 1). It is highly recommended that the pump be moved as far away as possible from the water by using a longer hose. The risks are too great to have water contamination in the Hamlet water supply.

   During the inspection it was noticed that the drip tray was full of water (see Figure 1). There were no indications of contamination so the water was emptied and the pump repositioned so any future water leaks would occur outside the drip tray. The hoses should be well connected and ensure there are no leaks from all fittings (if any spraying water it should be repaired). Please note that any leaks of water going into the drip tray remove containment volume and is a source of contamination. Pumping operations should be as dry as possible when in close proximity to the water. To be proactive the water pump should be filled away from the waters edge. Any spills or leaks will more than likely go right into the Water Supply.
4. During the September 21, 2010 Inspection there were some oil drips below the truck water fill pipe. Ensure the Water Trucks are not leaking oil and are maintained to prevent potential water supply contamination. Surface water and the oil contaminated soil are all in the same drainage surrounding Water Lake. This is critical since the water trucks are now being brought to fill directly from Water Lake It is even more important now to ensure there are no oil leaks etc. It would even be appropriate to have a drip tray present.
5. While the current GNWT- Public Works remediation project in the community is good for the area in that it is removing hydrocarbon contaminated soil from the old POL tank farm spill on the beach in front of the Hamlet there are still considerable risks involved that need to be monitored to ensure the protection of the water supply. The landfarm – containment cell is located just north of the old Environment Canada Meteorological Station (aka Icicle Inn) along the gravel road bordering Water Lake and it will be important to monitor for blowing soil /dusting and any other sources of contamination (see Figure 2). Spilled material by any trucks or equipment should be cleaned up and any future grading needs to be to the side of the road opposite the drainage for the water supply. It is important to monitor the containment cell throughout the winter and ensure the exposed soil is secure against any erosion.
6. The Spill Response Kit should be unwrapped and accessible if an emergency occurs. So not publicly available the kit should be moved to a secure room at the Water Treatment Plant to prevent any unauthorized removal of supplies or vandalism.

Notes:
- Liquid chlorine is now being used by the Hamlet for their water treatment.

WASTE DISPOSAL

Well Waste:	Off-Site Removal	N/A	Drilling Sump	N/A	Downhole	N/A	Land spread	N/A
Solid Waste:	Open Dump	N/A	Landfill	A[2,6,7,8,911,12]	Burn & Bury	Conditionally acceptable	Under ground	N/A
	Owner / Operator	Hamlet of Sachs Harbour	Sludge Disposal	N/A	Other	N/A		
Tailings:	Tailings Pond	N/A	Natural Lake	N/A	Under ground	N/A		
Sewage:	Sewage Treat. System	A[5,6]	Camp Sump	N/A	Natural Water Body	A	Wetland Treatment	A
	Continuous Discharge	N/A	Inter. Discharge	A	Seasonal Discharge	A	Trench	N/A

Indicate: A - Acceptable U - Unacceptable N/A - Not Applicable N/I - Not Inspected

MUNICIPAL WATER LICENCE INSPECTION FORM

Discharge Quality	U[3,10]	Construction	N/A	Disch. Meas. Dev.	A	Freeboard	A
Decant Structures	N/A	O&M Plan	N/A	Dams, Dykes	N/A	Seepages	N/A
Dyke Inspections	N/A	A&R Plan	N/A	Erosion	A[4]	Spills	U[1,2,5,13]
Conveyance Lines	N/A	Pond Treatment	N/A	Runoff Diversion	N/A	Sump Treatment	N/A
Sump Liners	N/A		SNP Samples Collected		None		
Periods of Discharge	Does not appear to discharge, unless spring highwater.		Effluent Discharge Rate		Natural outflow.		

Waste Disposal Comments:

Concerns:

1. There was a drum at the Solid Waste Disposal Facility(SWDF) that appeared to be leaking out of its bung opening (bung was in place) so it needed to be tipped up but the other end had a bullet hole so the contents should be transferred to another secure drum (see Figure 3). Gradually this whole drum will leak out – 205L worth. Since this particular drum might spill its entire contents it should be cleaned up immediately. Drums at the SWDF should be checked regularly to ensure they are secure and clean up any spills.
2. Contaminated soil from an old POL tank farm spill on the beach in front of the Hamlet was excavated by Biogenie S.R.D.C. Inc and deposited at the SWDF (see Figure 4). It would be appropraite to remove this soil and transfer it to the GNWT- Public Works (PW) landfarm – containment cell by the old Environment Canada Meteorological Station (aka Icicle Inn) since it is apart of that original spill (see Figure 2) and should be considered as part of POL tank farm spill cleanup.

Otherwise for the POL contaminated soil piles at the SWDF there needs to be a berm to prevent migration of contaminants into water and should include a liner under the contaminated soil pile (see Figure 4). Since contaminated soil exists at the SWDF without proper containment, this is a violation of Part D: Conditions Applying to Waste Disposal, Section 8 of the Water Licence. The details surrounding this contaminated soil are unknown as little information has been provided to the Hamlet. Apparently some soil samples were taken, the results should be obtained, reviewed and the soil material properly managed. The presence of contaminated soil at the SWDF without proper containment is unacceptable and will lead to further contamination.

In light of the current GNWT-PW remediation project occurring at the Hamlet it would appropriate to reuse the liner and/or any extra or left over materials to create a small containment cell – landfarm at the SWDF to allow containment and treatment of any contaminated soil/spills that are generated by the Hamlet in the future. Not to mention there already exists expertise and experience to build a containment cell for contaminated soil.

3. Discharge quality is unknown because samples from the sewage lagoon discharge and runoff from the Solid Waste Disposal Facilities (SWDF) had not occurred at the time of Inspection which is a violation of Part B: General Conditions, Section 2, of the Water Licence. In talking with the Acting Senior Administrative Officer (SAO)– Adella Carpenter there are plans to take samples of the runoff from the SWDF and the sewage lagoon. The Hamlet plans to order supplies from Taiga Lab. (see Surveillance Network Program section.)
4. Erosion is occurring at the front of the sewage discharge chute that needs to be repaired. This material that is eroded away is deposited back into the sewage lagoon which decreases efficiency of the lagoon and its treatment process. This also costs the Hamlet to repair damage to the turnaround pad. There are plans to replace the sewage discharge chute. Ensure tire stops are installed while the sewage truck is present so as to have proper spacing. This will prevent unnecessary erosion and potential destruction of chute/turn around pad.
5. There is staining located in front of the discharge chute that indicates that the sewage truck is leaking oil (see Figure 5). Check the sewage truck and repair any leaking oil to limit contamination to the surrounding area and keep the sewage infrastructure clean.
6. While the expenditure of capital to replace the sewage discharge chute is understood the Hamlet should consider that the SWDF needs the money more. There is household garbage/domestic waste all over the place that is not being deposited into the waste cell. There is other waste (batteries, drums, tanks, etc) that are not being put in their proper locations. Further work is needed to clean up and segregate the site to aid in maintaining the SWDF. Without this maintenance residents will continue to deposit waste at random throughout the site which will just mean more work for Hamlet staff.
7. There needs to be improved management of the SWDF as material is being piled/collected where its convenient and not where it should go. There had been good waste segregation at one time but has not been maintained thus various waste streams are getting mixed. Thus space is not being used efficiently. Waste segregation signage is needed in the SWDF at each specific area. This would aid in ensuring that waste goes in the proper location and saves against improperly sorted waste that just has to get moved by Hamlet staff. Ensure signage is in the appropriate location and continually maintained to further increase public guidance and assistance.

If waste is disposed of in the wrong area it should be moved before other waste accumulates there as well. Signage should be present for but not limited to the following: bulk metal waste, white metal waste (fridges, washers/dryers, etc.), hazardous waste (drums, batteries), empty drums, fuel tanks, tires, vehicles/ATVs/ skidoos, honey bag pit, waste animal pit, domestic/household garbage, paper/wood/cardboard- designated burning area, etc. Segregation will aid in an organized site that residents will respect and help maintain. This will also keep costs down in the future when it is time to recycle waste or abandon and restore the site.

8. Burning is evident by the left over waste. Talked with Acting SAO and she said burning would no longer be done. The whole waste cell had burned waste present. Segregation is needed to ensure just approved wastes (paper, cardboard, and untreated wood) are being burned. Further environmental/health issues will arise from the toxic smoke and by products from burning unsegregated waste in addition to causing further contamination issues due to all waste being mixed. There will be leachate contamination problems due to all waste being burned which means when water flows through the ash it now has all kinds of pollutants present. This is why certain wastes are approved for burning according to the guideline “Municipal Solid Wastes Suitable for Open Burning”, developed by the GNWT Department of Environment and Natural Resources. The Environment Canada document titled ‘What Goes Up Must Come Down - Open Burning of Garbage Is Harmful to Your Health and the Environment’ has also been provided.
9. The current solid waste cell needs to be properly maintained and covered which would assist with preventing windblown debris. High berms and fencing at the SWDF are an effective way to control windblown materials. Debris needs to continue to be cleaned up as it is a part of regular maintenance. A clean and organized facility in which the public provides assistance is further aided by cleaning up and preventing windblown debris.

MUNICIPAL WATER LICENCE INSPECTION FORM

10. In the northeast corner of the current waste cell there was standing water and runoff coming from the waste cell through a culvert that ran through the cell berm (see Figure 6). The water was black and other strange colours with a surficial hydrocarbon like sheen present. This runoff needs to be sampled so as to monitor the site and possible contaminant issues for the Surveillance Network Program. Since no sampling has occurred this is a violation of Part B: General Conditions, Section 2, of the Water Licence.
11. Solid Waste Disposal Facility (SWDF) appears to be filling up. The waste cell is almost full. There needs to be planning for another waste cell. This will allow the structure to be built and preparation of a cell before one is needed. Amendments, modifications, and construction conditions as per Part F and G of the Water Licence might be required, so there should be communication with the Northwest Territories Water Board on Hamlet intentions. In addition, some proper abandonment and restoration procedures as per Part H: Conditions Applying to Abandonment and Restoration in the Water Licence, will be required.
12. Drums and batteries are located throughout the SWDF and in some specific areas but need to be segregated in a designated hazardous waste temporary storage area. The Hamlet Foreman talked about putting drums in a bermed area and using a lined sea crate to collect batteries at the maintenance shop. It would be important to store full and empty barrels separately to aid in any future waste disposal activities. All these procedures would aid in ensuring they are collected in an organized and secure fashion that would then be ready for shipping out for disposal. Since the hazardous wastes are not stored in a bermed temporary storage area, this is a violation of Part D: Conditions Applying to Waste Disposal, Section 9, of the Water Licence. It might be prudent for Hamlet staff to build a berm around the few large groups of hazardous waste such as barrels, batteries etc. and contain them where they are. This would save on time and work involved to move all the material.

In the containment/storage areas these materials need to be collected, consolidated, prepared and either shipped to an approved facility for disposal or burned (fuel and/or oil) in approved equipment. This will ultimately maintain the SWDF in a well managed state that encourages public participation and assistance. There needs to be regular checks at the SWDF for leaks and subsequent repairs including containment of leaking drums, containers, materials to prevent spills and further contamination of the environment. Ensure drums are secure, contained, properly segregated and fluids are unable to leak from containers (strong drum, bung in place, no holes). If required, fluids should be transferred to secure and approved containers.
13. There are indications of hydrocarbon spillage at the SWDF. There is no need for contaminated soil to be a further risk and must be cleaned up, removed, remediated and properly disposed of. It is recommended to have a designated place for contaminated soil material. There needs to be a liner under any contaminated soil pile and a berm for containment to prevent migration of contaminants into the water as per Part D: Conditions Applying to Waste Disposal, Item 8, of the Water Licence.

Please note that soil still needs to be correctly remediated so it can be properly disposed of. There needs to be regular turning of soil/aeration, sampling, removal of soil for proper disposal. This will ultimately expose other layers of soil to the remediation process and create an efficient remediation program. A contaminated soil storage area at the SWDF should not be for long term storage but allow for the remediation of soils and their permanent disposal. Please note that when any contaminated soil is deposited at the SWDF the Hamlet needs to notify the Inspector as per Part D: Conditions Applying to Waste Disposal, Item 7, of the Water Licence.

Notes:
- Sewage is deposited in the sewage lagoon at a rate estimated to be 7000L about 2-3 times a day, 3 times a week. The sewage lagoon is a natural water body and is the lowest elevation in the immediate area and does not immediately appear to discharge. However there are indications from staff that it might discharge when there is excess water during the spring or exfiltration is possible through the active layer/ground water surrounding the sewage lagoon. The opposite side of the lagoon from the sewage discharge chute would be where any discharge would occur as this is a low lying wetland area.
- The coloration of the sewage lagoon was a clear dark green colour which is an indicator of good performance.
- Cleanup of the Solid Waste Disposal Facility (SWDF)and the installation of a fence for the waste cell is currently being undertaken.
- Signage is being ordered for the Hamlet infrastructure.
- During the September 21, 2010 Inspection it was understood that the Hamlet has a waste oil burner which is not being used. This is a valuable asset that could be used to burn used oil that the Hamlet generates and would otherwise need to ship out for disposal.
- **A Sewage Treatment Plan is due June 30, 2012 a one year extension was granted by the Northwest Territories Water Board.**
- **A Municipal Solid Waste Operations and Maintenance Plan (O&M Plan) is due June 30, 2012. Please note this will be the first time an O&M Plan has been available for the Hamlet of Sachs Harbour.**

FUEL STORAGE

Owner:	Hamlet of Sachs Harbour	Operator:	Hamlet of Sachs Harbour	Condition of tanks:	A
Berms & Liners	A	Water within Berm:	Yes[4]	Evidence of Leaks:	A
Drainage Pipes	A	Pump Station and Catchment Berm	A[3]	Runoff Diversion	N/A
Pipeline Condition	A[1,2]	Not Applicable:	N/A		

Fuel Storage Comments:
Concerns:
1. Originally piping was leaning against the flex pipes from the fuel tank to the Water Treatment Plant. This was a concern as it could create stress for the piping. It was recommended that this should be removed and the Hamlet staff – Emsley Nasogaluak then moved it. It is important to continue to monitor the fuel tank and piping for any issues like leaks etc. on a regular basis.
2. Water Treatment Plant flex pipe for pipeline to the fuel tank is not entirely in the bermed area and needs to be routinely monitored. This is a concern since if there is any failure; fuel might not go into the berm during a spill.
3. Inside the generator room there was materials (pipes, parts, hoses etc) piled up against the pipeline from the outside fuel tank to the equipment. The pipeline needs to be kept clear so it can be observed for any problems or other issue with fuel infrastructure, visual of drip trays etc. Excess material should be moved to the storage on the end of the building.

MUNICIPAL WATER LICENCE INSPECTION FORM

4. Water was present in the metal berm for the fuel tank. This was causing corrosion of the metal berm but can also be a source of contamination in that any water presence at some point might need to be removed. A cover or shroud would be recommended to keep precipitation out. Ensure the water contained in the berm has no sheen and is not disposed in the Water Lake watershed area.

Note:
- Some water (about an inch deep) is present within the metal berm for the WSF fuel tank which is outside and exposed to the elements. The berm shows signs of rusting as a result.

SURVEILLANCE NETWORK PROGRAM

Samples Collected Hamlet	No samples taken at the time of Inspection but the Hamlet is making plans to sample. [3]		
Samples Collected DIAND	No samples were collected at the time of inspection.		
Signs Posted: SNP	SNP signage is N/A. Maps have not been provided. [4]	Warning	Nuisance Ground - old fallen over, vandalized, needs to be fixed and repainted. Signage is still needed for Water Supply Facilities, Solid Waste Disposal Facilities, Sewage Disposal Facilities. [5]
Record & Reporting	2010 Annual Report and Spill Contingency Plan were submitted.[1] Water consumption records have been provided for 2004-2008, but not as Annual Reports.[2] Annual report for 2009 has not been sent.		
Geotechnical Inspection	N/A		

Surveillance Network Program Comments:
Concerns:
1. The Hamlet is to be congratulated for providing the Annual Report and Spill Contingency Plan, which arrived on July 11, 2011 and February 9, 2011 respectively. Please note the Annual Report is to be submitted by April 30 of the year following the calendar year reported and the Spill Contingency Plan was due June 30, 2010.
2. If data is limited the Annual Reports should be sent with what information is known so there are records available. Annual Reports from 2004-2009 have not been submitted and is a violation of Part B: General Conditions, Item 1, of the Water Licence.
3. Surveillance Network Program requires that water quality from the outflow of sewage lagoon and run-off from the Solid Waste Disposal Facilities are to be monitored by the Hamlet of Sachs Harbour. At the time of Inspection sampling had not occurred and this is a violation of Part B: General Conditions, Item 2, of the Water Licence. In talking with the Acting Senior Administrative Officer (SAO)– Adella Carpenter there are plans to take samples of the runoff from the SWDF and the sewage lagoon. The Hamlet plans to order supplies from Taiga Lab.
4. Since SNP signage is no longer required it is now necessary for the Hamlet to provide a map or drawing indicating the locations of the SNP sampling locations. In light of the recent workshop that occurred with the Northwest Territories Water Board in August 2011 there was a SNP map provided to the Hamlets and would fulfill the SNP map requirement by the Water Licence. Since the Hamlet has not provided a map, this is a violation of Part B: General Conditions, Item 4, of the Water Licence.
5. Signage is still needed to inform the public and promote awareness at the Sewage Disposal Facilities, Water Supply Facilities, and the Solid Waste Disposal Facilities. Since the Hamlet of Sachs Harbour has not complied this is a violation of Part B: General Conditions, Item 5, of the Water Licence.

NON-COMPLIANCE/VIOLATIONS OF ACT OR LICENCE

Part B: General Conditions, Item 1,
"The Licensee shall file an Annual Report with the Board not later than April 30th of the year following the calendar year reported..."

Part B: General Conditions, Section 2,
“The Licensee shall comply with the “Surveillance Network Program” annexed to this Licence, and any amendment to the said “Surveillance Network Program” as may be made from time to time, pursuant to the conditions of this Licence.”

Part B: General Conditions, Section 4,
“The Licensee shall, within 60 days of the issuance of this Licence, submit to the Board for approval a map or drawing indicating the location of all Surveillance Network Program sampling stations.”

Part B: General Conditions, Section 5,
“The Licensee shall, within 60 days of issuance of this Licence, post signs in the appropriate areas to inform the public of Water Supply and Waste Disposal Facilities. All postings shall be located and maintained to the satisfaction of an Inspector.”

Part D: Conditions Applying to Waste Disposal, Section 8,
“The Licensee shall contain all contaminated soil in such a manner as to minimize the potential for migration of contaminants into any Waters, to the satisfaction of an Inspector.”

Part D: Conditions Applying to Waste Disposal, Section 9,
“The Licensee shall segregate and store hazardous Waste in a temporary storage area, to the satisfaction of an Inspector.”

Inspector’s Signature: _____

MUNICIPAL WATER LICENCE INSPECTION FORM

Inspection Images:

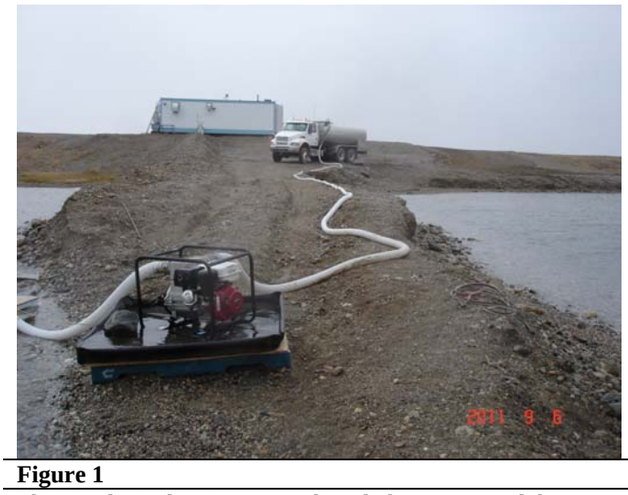

Figure 1

The Hamlet is drawing water directly by pumps and the water truck from Water Lake then batch chlorinating. Please note that given that the water pump is in close proximity to the water it is critical to avoid any spillage of fuel/oil or potential leaks from the pump. During the inspection the drip tray was full of water so ensure the pump/hoses are water tight.

Figure 2

POL tank farm spill remediation project has a landfarm that needs to be monitored to protect the water supply nearby. It is located just north of the old Environment Canada Meteorological Station (aka Icicle Inn) along the gravel road bordering Water Lake and it will be important to monitor for blowing soil /dusting and any other sources of contamination.

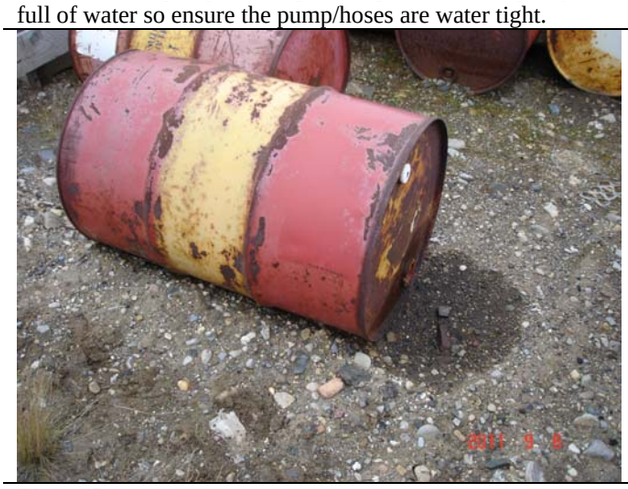

Figure 3

There was a drum that appeared to be leaking out of its bung opening so the contents should be transferred to another secure drum. Gradually this whole drum will leak out – 205L worth. Since this particular drum might spill its entire contents it should be cleaned up immediately.

Figure 4

Contaminated soil from an old POL tank farm spill on the beach in front of the Hamlet was excavated by Biogenie and deposited at the Solide Waste Disposal Facilities. This soil should be transfered to the GNWT- Public Works landfarm – containment cell since it is apart of that original spill.

Figure 5

There is staining located in front of the discharge chute that indicates that the sewage truck is leaking oil. Check the sewage truck and repair any leaking oil to limit contamination to the surrounding area.

Figure 6

In the northeast corner of the waste cell is standing water and runoff coming from the cell through a culvert located within the berm. This runoff needs to be sampled to monitor the site and any possible contaminant issues from the water.