

November 6, 2015

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

**Re: Hamlet of Paulatuk
Water Licence – N3L3-1619
Type B Municipal Water Licence Renewal
Draft Water Licence Review
Request for Review and Comments**

Dear Mrs. Castaneda,

The Department of Environment and Natural Resources (ENR), Government of the Northwest Territories (GNWT) has reviewed the draft Water Licence at reference based on its mandated responsibilities under the *Environmental Protection Act*, the *Forest Management Act*, the *Forest Protection Act*, *Waters Act* and the *Wildlife Act* and provides the following comments and recommendations for the consideration of the Board.

Topic 1: Part A: Scope and Definitions of Paulatuk Draft Water Licence

Comment(s):

While “Sewage Disposal Facilities” can be used as a general term, information specific to the Paulatuk sewage disposal facilities can be integrated into the definition for greater clarity.

Recommendation(s):

- 1) For consistency between municipal Water Licences, ENR recommends that the Inuvialuit Water Board (IWB) utilizes a Sewage Disposal Facilities definition that includes information specific to Paulatuk’s current system as indicated in the following definition:

“Sewage Disposal Facilities Serving Paulatuk” comprises the area and engineered structures designed for containment and treatment as identified in Drawing Number [XXX], titled “[XXX]”, [Engineering partners firm], [Date].

Topic 2: Clarifications in Part E: Conditions Applying to Operation and Maintenance

Comment(s):

None

Recommendation(s):

- 1) ENR recommends that Condition Part E Item 1 f) should be rephrased for clarity as “Segregation and management of contaminated soil and snow at the Solid Waste Disposal Facilities;”. Part E Item 1 g) should specify “Hazardous Waste segregation and management *occurring at the Solid Waste Disposal Facilities* or “from Solid Waste Disposal Facilities *activities*”.
- 2) ENR recommends that other, or similar clarifications, to be made to Paulatuk’s Water Licence as may be necessary.

Topic: Treatment and/or Disposal of Hazardous Wastes

Comment(s):

Conditions of the draft Water Licence indicates that contaminated soils are not to be treated at the Solid Waste Facility, as the Hamlet is currently does not have a soils treatment facility (landfarm) and such treatment activities could increase the risk of contamination. However, the Water Licence does indicate that contaminated soils may be accepted for temporary storage – until transported to an appropriate treatment facility.

However part E Item 3 d) [regarding components to be included in a Hazardous Waste Management Plan] includes the following wording: “*methods of treatment and/or disposal of Hazardous Waste (including contaminated soils)*”. This statement appears inconsistent with the intent of the Water Licence for management of hazardous wastes (and contaminated soils) as described above.

Recommendation(s):

- 1) It is recommended that IWB should clarify this apparent discrepancy between the licence conditions that do not permit on-site treatment of contaminated soils and Part E Item 3.d) which does appear to consider on-site treatment. . Additional wording should be included to differentiate between treatment (if/where appropriate) and

temporary storage. In addition, Part E Item 3 should not refer to “disposal” of Hazardous Waste – which could be misinterpreted as *on site disposal*. As such, *disposal* should be replaced (where/if appropriate) by the term *storage* or *transport*. ENR has developed a guide to developing a community based hazardous waste management plan that the Hamlet of Paulatuk may reference to offer guidance. For information, please contact Gerald Enns (email, Gerald_enns@gov.nt.ca, phone 920-3326)

- 2) It is recommended that the IWB to make the necessary adjustments within the conditions of Paulatuk’s Water Licence, related to hazardous waste management, in order to prevent any misinterpretation related to temporary storage, containment, transport and if/where appropriate, treatment and disposal to approved waste disposal facilities.

Topic 3: Treatment and/or Disposal of Hazardous Wastes – Part E, Item 3

Comment(s):

Part E Item 3 c) further refers to “detailed amounts and sources of Hazardous Waste that are/are not accepted”. ENR finds it difficult to determine detailed amounts of hazardous waste that are or not accepted.

Part E Item 3 e) also states “Hazardous Waste manifest identifying all Hazardous Waste being stored in the Temporary Hazardous Waste Contaminant Area.” ENR notes that a hazardous waste manifest is typically used in the context of transportation and disposal (as a prescribed 6 part form used to document the ultimate disposal of hazardous waste), and should therefore not be used in the context of storage. The term “inventories”, as currently used and developed by ENR to maintain storage and facilitate transportation and disposal, may be more accurate.

Recommendations:

- 1) ENR recommend rephrasing Part E Item 3 c) into the two following separate items “Identify the type and sources of hazardous waste that are, and are not accepted into the disposal facility”, and “Identify the maximum quantities of each type of hazardous waste that will be stored on-site.”
- 2) ENR recommends that the term “inventories” will be further described as “a hazardous waste inventory that identifies the type, means of containment, and quantity of hazardous waste being stored in the temporary hazardous waste containment 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).

If you have any questions or concerns, please do not hesitate to contact Patrick at 920-6118 or 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