



November 3, 2015

Mayor Ray Ruben
Hamlet of Paulatuk
P.O. Box 98
Paulatuk, NT X0E 1N0

Dear Mayor Ruben: 

RE: N7L3-1619 - HAMLET OF PAULATUK, MUNICIPAL WATER LICENCE RENEWAL APPLICATION

When the Inuvialuit Water Board receives a water licence application, it requests comments on the application from those government departments that hold a regulatory interest in water and waste management in the Northwest Territories. The GNWT Department of Environment and Natural Resources (ENR) is one of those departments from which comments are requested.

In consideration of the ENR response to our request, the IWB has determined that revisions will be required to several of the management plans/manuals attached to your application. These are as follows:

1. Sewage Treatment Facility Operation and Maintenance (O & M) Manual:
 - a. Replace title to "Sewage Disposal Facilities Operation and Maintenance Plan";
 - b. On page 4, section 3.2.2 delete "AANDC Inspector" replace with "ENR Inspector";
 - c. Section 3, Page 4 – Operational and Maintenance Procedures should include a routine maintenance schedule for sludge depth measurements. The measured sludge depth is to be reported annually. Prior to the Sludge removal, a Sludge Removal Plan shall be submitted to the Board for approval;
 - d. Page 5, section 3.3.1 states "However, contaminants such as heavy metals, solvents and petroleum products may enter the lagoon due to municipal activities." Examples of municipal activities should be listed that could lead to contaminants such as heavy metals, solvents and petroleum products entering the Sewage Disposal Facilities;
 - e. Page 10, section 3.4 delete "Surveillance Monitoring Network" replace with "Surveillance Network Program"; and
 - f. Section 3 does not include maintenance and inspection requirements for sewage trucks even though they can be a source of pollution due to spills.

Include a listing of general maintenance and inspection requirements for sewage trucks.

2. Spill Contingency Plan:

- a. The flow chart on page 8 should be updated to include the Hamlet Foreman and Senior Administrative Officer contact information. This informative diagram to be highly visible at all waste management locations and/or facilities in case of a spill emergency;
- b. Section 3.4 Page 16: replace title with "Procedures for Transferring, Storing and Managing Spill Related Hazardous Waste" and replace all references to spill related contaminated waste to spill related hazardous waste;
- c. Section 3.4 Page 16: Procedures for Transferring, Storing and Managing Spill Related Hazardous Waste should include current temporary locations of spill related hazardous waste as well as final approved destination for receipt of spill-related hazardous waste;
- d. Page 4, Figure 1 of the Spill Contingency Plan indicates spill kit locations at the maintenance garage and the truck fill station. A third spill kit should be located at the Solid Waste Disposal Facilities and Figure 1 (Map of Spill Kit Locations) revised accordingly;
- e. Item 3b of Paulatuk response to additional information request, distribution list of plan recipients as per section 1.3 of the Spill Contingency Plan, change "Inuik Office" to "Inuvik Office" in the third row;
- f. Spill contingency measures for the Water Supply Facilities to be included given that there are chemical products and fuel stored on site and heavy equipment operating near the water supply. Include Water Supply Facilities in maps and drawings as a potential spill site;
- g. Section 3 of Spill Contingency Plan should also include the Water Supply Facilities as a potential spill source and describe the potential spill sizes from various sources identified;
- h. Section 1.9, Table 2, add mercury containing products (e.g. thermostats, fluorescent lights, switches, etc.) to the list of hazardous materials stored on site. As a reminder, ENR can handle the final disposal of mercury containing products at no cost other than shipping;
- i. Section 5: Include the requirement for annual training and spill reporting; and
- j. Section 1.4: Include the statement "the Spill Contingency Plan should be reviewed annually.

3. Solid Waste Facility O & M Manual:

- a. Replace title to Solid Waste Disposal Facilities Operation and Maintenance Plan;
- b. Subsection "3.1.4 Animal Carcasses", the plan notes that Hamlet crews will be responsible for incinerating animal carcasses. This section is required to be further elaborated with statement "Dispose of animal carcasses in designated animal pit and cover with fill material periodically to deter any wildlife and other nuisances";
- c. Page 39, section 3.7: Add sampling, monitoring and reporting duties to the List of Duties for Site Operators so they are aware of their responsibilities

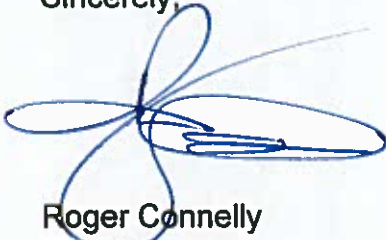
as per the Surveillance Network Program and Site Operators be trained appropriately;

- d. Section 9.3: Include local ENR personnel contact information: **Bobby Ruben ENR – (867) 580-3021.**

Please submit the revised Sewage and Solid Waste Disposal Facilities Operation & Maintenance Plans and the Spill Contingency Plan within three (3) months of the renewal of the Water Licence. In the interim implement all plans as initially submitted.

Should you have any questions with regard to the required revisions please contact Mardy Semmler, Executive Director, at 867-678-8609 or semmlerm@nwtwb.com.

Sincerely,



Roger Connelly
Chairperson

cc: Patrick Clancy, Environmental Regulatory Analyst – ENR Yellowknife
Philippe Thibert-Leduc, Water Resources Officer - ENR Inuvik
Greg Morash, Senior Administrative Officer – Hamlet of Paulatuk