

June 25, 2020

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

The Inuvialuit Water Board (IWB) acknowledges receipt of the above-mentioned renewal application on June 12, 2020. The IWB has completed an initial review of the application and as a result, additional information is required for the IWB to continue with the application renewal processes. Please provide the following:

- 1. Environmental Impact Screening Committee (EISC) decision letter.
- 2. Schedule C Water Licence Renewal Application (if not applicable indicate "N/A"):
 - a. Section 2 Address of head office in Canada if incorporated, telephone and fax.
 - b. Section 9 Other persons or properties affected by this undertaking (give name, mailing address and location; attach a list if necessary).
 - c. Section 10 Predicted environmental impacts of undertaking and proposed mitigation.
 - d. Section 11 Contractors and Sub-contractors (names, addresses and functions).
 - e. Section 12 Studies undertaken to date (attach list if necessary).
- 3. Spill Contingency Plan:
 - a. As listed on page 4, Table 4 Appendix D does not include Material Safety Data Sheets (MSDS) for Mercury, Sodium Hydroxide and Citric Acid. Provide MSDS for these materials.
 - b. Page 4, Table 4, Column 3 if actual quantities on site are unknown for some material, provide estimated volumes. Column 4, if actual on-site "maximum quantities that can be stored" are unknown, provide estimated on-site "maximum quantities".
 - c. If the public may be impacted by a spill, include the notification procedures for alerting the public.
- 4. Solid Waste Disposal Facilities Operation and Maintenance Plan:
 - a. Provide the following information regarding the Solid Waste Disposal Facilities operations:
 - i. Hours/day of operation of the facility;
 - ii. Year landfilling began at the facility (estimate year if unknown);
 - iii. Number of days per week landfill operator is on site and the hours per day;

- iv. Is heavy equipment used onsite (e.g. loader, excavator), if "yes" list the equipment;
- v. Distance from the Solid Waste Disposal Facilities to a fish-bearing waterbody (lake, river, etc);
- vi. A brief description of the method of retention and treatment for contaminated drainage from the Solid Waste Disposal Facilities;
- vii. A brief description of the flood response measures including alternate temporary solid waste disposal practices, location and mitigation measures;
- b. Solid Waste Disposal Facilities provide the following information:
 - i. Are there systems in place for leachate controls? ie: active leachate collection and treatment (e.g. engineering liners), facility relies solely on natural attenuation of landfill leachate, other (specify);
 - ii. If the facility has a liner, please indicate what type of liners are present ie: High-density polyethylene (HDPE) / Polyvinyl chloride (PVC) / geomembrane / plastic liner, Geosynthetic clay liner (GCL), other (specify); and
 - iii. How is the liner monitored for leaks?
- c. A brief description for contaminated soil and snow segregation, the temporary storage location and final disposal to an approved facility.
- d. Page 4, Table 2: based on the estimated waste generation Is the remaining empty space larger than the space required for the next 10 years? If there is not enough space for the next 10 years for waste disposal, what is the contingency plan to deal with this?
- e. Indicate tipping fees for each waste category, if applicable.
- 5. Sewage Waste Disposal Facilities Operation and Maintenance Plan:
 - a. Are honeybags accepted at the Sewage Waste Disposal Facilities? If Yes, estimated annual volume of honeybags, where stored / disposed of?
 - b. How are hazardous wastes and other unacceptable substances kept out of the Sewage Waste Disposal Facilities?
 - c. A description of the Solid Waste Disposal Facilities perimeter ditches to manage run-on?
 - d. A description of the operator training programs and future plans for training.
- 6. Hazardous Waste Management Plan:
 - a. Information regarding security control:
 - i. How is public access to the temporary Hazardous Waste Containment Facility controlled?
 - ii. Is there signage posted at the temporary Hazardous Waste Containment Facility?
 - List of staff member(s) responsible for hazardous waste management including the temporary Hazardous Waste Containment Facility (e.g. name, phone, email, role of each operator).
 - c. Indicate if the Hazardous Waste Containment Facility operator have the following training (current or expired):
 - i. Ozone Depleting Substances (halocarbons, refrigerants) Technician
 - ii. Transportation of Dangerous Goods (TDG)
 - iii. Workplace Hazardous Materials Information System (WHMIS)
 - iv. Waste Management
 - v. First Aid and CPR

- vi. Hazardous Waste Operations and Emergency Response (HAZWOPER)
- vii. Brief description of any other operator training programs and future plans.
- d. Include GNWT ENR brochure for "household hazardous waste" available at: https://www.enr.gov.nt.ca/sites/enr/files/brochures/household_hazardous_wastes. pdf
- e. How does the community collect household hazardous wastes?
- f. Describe the frequency of inspections of the Hazardous Waste Containment Facility and how the records are maintained.
- g. Page 2, Table 2 (Columns 3 & 4) indicated "Unknown" and "Until shipped off-site" provide "Quantity Stored On-Site" and "Maximum quantity that can be stored on-site" prior to the material shipped out to the approved facility for final disposal. If actual quantity is unknown, provide estimated volumes.
- h. If accepted at the temporary Hazardous Waste Containment Facility, include the following materials in Tables 2 & 3 (pages 2 & 4):
 - i. Paint;
 - ii. Oily debris;
 - iii. Lead-acid batteries (e.g. car batteries);
 - iv. Waste antifreeze/glycols;
 - v. Contaminated soil / snow / water;
 - vi. Asbestos:
 - vii. Ozone-depleting substances (ODS) / halocarbons / refrigerants;
 - viii. Waste fuel; and
 - ix. Vehicles (of which batteries, fluids and mercury switches have not been removed).
- i. Is the "Paint" accepted at the temporary Hazardous Waste Containment Facility? If paint is accepted, describe methods used to segregate the different types of paint (e.g. acrylic (latex), oil-based, and lead-amended).
- j. Are residue fuel tanks, heating oil tanks, residue drums accepted at the temporary Hazardous Waste Containment Facility? If residue tanks and drums are accepted, describe the conditions and protocols for acceptance (e.g. do they have to be punctured, drained, sludge removed, etc. before the facility will take them?).
- k. How are hazardous wastes (listed on Tables 2 and 3) stored to prevent spills and leaks (e.g. primary containment, secondary containment, or other methods to prevent spills and leaks)?
- I. How is it secured to keep people from coming into contact and to ensure public safety?
- m. Describe protocols for regular inspections of hazardous materials including the frequently of inspections (e.g. daily, weekly, monthly)?
- n. How are records of inspections and inventories maintained? Who (i.e. which staff member) is responsible for inspections?
- Is contaminated soil, snow and/or water accepted at the temporary Hazardous Waste Containment Facility? If accepted, describe the methods implemented for containment of spills and leaks before being shipped to an approved facility for final disposal.
- p. If hazardous waste was transported to an approved Hazardous Waste Containment Facility for final disposal, provide:
 - i. Hazardous waste shipped out for recycling or disposal;
 - ii. Quantities shipped;
 - iii. Name of approved Hazardous Waste Containment Facility;
 - iv. Location of approved Hazardous Waste Containment Facility;
 - v. Timing;

- vi. Method of transportation; and
- vii. Other (specify).
- q. Are tipping fees charged for household hazardous waste? If applicable, indicate types of hazardous waste for which tipping fees are charged.
- r. Include the record keeping requirements related to hazardous waste management (e.g. type, quantity, storage location, containment method, etc.). Describe how the recorded information is kept and where?
- s. When hazardous substances are being handled, employee and public safety are very important, describe health and safety procedure for handling and management of hazardous waste.

Please submit the additional information for the IWB to continue processing the application in a timely manner. The submitted documents, including all related IWB correspondence, will be placed on the IWB Public Register.

Should you have any questions, please contact me at (867) 678-8610 or adhikarib@inuvwb.ca or Mardy Semmler, IWB Executive Director, at 867-678-8609 or semmlerm@inuvwb.ca.

Sincerely,

Bijaya Adhikari, PhD

Science and Regulatory Coordinator

cc: John Holland, SAO - Hamlet of Paulatuk

Ceileigh Burns, Project Manager, Dillon Consulting