

Environmental Protection Operations Directorate
Prairie & Northern Region
5019 52nd Street, 4th Floor
P.O. Box 2310
Yellowknife, NT X1A 2P7

ECCC File: 5200 000 019/002
IWB File: N7L3-1531



October 31, 2022

via online review system

Mardy Semmler
Executive Director
Inuvialuit Water Board
151 Mackenzie Road - Mack Travel Building - 2nd Floor
P.O. Box 2531
Inuvik, NT X0E 0T0

Dear Mardy Semmler:

RE: N7L3-1531 – Proponent – Hamlet of Sachs Harbour – Renewal Application

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Inuvialuit Water Board (IWB) regarding the above mentioned Renewal Application. ECCC is providing technical, science-based information and knowledge based on our mandate pursuant to the *Canadian Environmental Protection Act*, and the pollution prevention provisions of the *Fisheries Act*. These comments are intended to inform the assessment of this project's potential effects in the receiving environment and on valued ecosystem components. Any comments received from ECCC in this context does not relieve the proponent of its obligations to respect all applicable federal legislation.

The following comments are provided:

1. Open Burning

Reference(s)

- Hamlet of Sachs Harbour Solid Waste Facilities Operations & Maintenance Manual (2022)
- Solid Waste Management for Northern and Remote Communities, Planning and Technical Guidance Document, March 2017, Environment and Climate Change Canada, available at <http://www.ec.gc.ca/gdd-mw/default.asp?lang=En&n=97182135-1>
- Municipal Solid Wastes Suitable for Open Burning, Government of the Northwest Territories



Comment

ECCC acknowledges that the plan for open burning of appropriately segregated paper, cardboard, and clean wood waste, is in accordance with the GNWT guidance document on Municipal Solid Wastes Suitable for Open Pit Burning; however, ECCC guidelines discourage the use of open burning.

ECCC Recommendation(s)

ECCC recommends that the Hamlet of Sachs Harbour investigate waste disposal practices that minimize or eliminate the use of open burning, to the extent possible, given the location of the disposal facility.

2. Surveillance Network Program monitoring

Reference(s)

- Water Licence Application Questionnaire for Municipal Undertakings

Comment

ECCC notes that Surveillance Network Program (SNP) sampling has not been conducted since 2017, when samples were collected by the Water Resource Officer. Moreover, it appears that the Hamlet has not conducted any SNP sampling over the course of the current 5-year water licence.

As a result, it is not possible to assess the quality of the sewage effluent discharge nor the efficacy of the Sewage Disposal Facility. Similarly, it is not possible to assess Solid Waste Disposal Facility runoff quality nor detect any contaminants that may be migrating from the landfill into the receiving environment.

ECCC Recommendation(s)

ECCC encourages the Licensee to conduct the required SNP monitoring. Doing so will enable the Hamlet to monitor the treatment performance of the sewage disposal facilities, monitor whether the Solid Waste Disposal Facility is containing contaminants as designed, and monitor potential impacts on the receiving environment.

ECCC recommends that the Licensee prioritize implementation of the SNP, in accordance with the water licence.

3. Quality Assurance/Quality Control and Field Measurements

Reference(s)

- SNP Manual for Water Licence N7L3-1531, Water Licence Application Questionnaire for Municipal Undertakings

Comment

The SNP Sampling Manual would be strengthened by the addition of Quality Assurance/Quality Control (QA/QC) procedures and supporting field measurements. Incorporating

QA/QC procedures would enable the Licensee to identify and address issues that could affect the quality of the monitoring results. Recording supporting field measurements, weather conditions and field observations at the time of sampling is important to support the interpretation of monitoring results.

ECCC Recommendation(s)

ECCC recommends that the SNP Sampling Manual be updated to include:

- Relevant QA/QC procedures (including sample blanks, travel/trip blanks, and replicate samples); and
- Measurement/recording of field parameters (e.g., pH and temperature of effluent) and field notes (e.g., weather conditions, watercourse/waterbody conditions, effluent observations) at the time of sampling, and use this information to support interpretation of monitoring results.

4. Receiving Environments

Reference(s)

- Surveillance Network Program, Water Licence Application Questionnaire for Municipal Undertakings

Comment

The water licence SNP would benefit from adding descriptions of the receiving environments for each sampling station.

ECCC Recommendation(s)

ECCC recommends that the SNP include a description of the receiving environment(s) associated with SNP station 1531-2 (effluent discharge from Sewage Facilities) and SNP station 1531-3 (runoff from Solid Waste Disposal Facilities).

If you need more information, please contact Stephinie Mallon at Stephinie.Mallon@ec.gc.ca.

Sincerely,

[original signed by]

Stephinie Mallon
Environmental Assessment Officer

cc: Jody Small, Acting Head, Environmental Assessment North (NT and NU)