

August 5, 2008

Helga Harlander  
Land and Water Technician  
Gwich'in Land and Water Board  
P.O. BOX 2018  
INUUVIK, NT X0E 0T0

Dear Ms. Harlander:

**HAMLET OF FORT MCPHERSON, G03L3-001**  
**80% Design Document Review, Community Landfill.**

The Department of Environment and Natural Resources (ENR) has reviewed the above application based on its mandated responsibilities under the *Wildlife Act*, the *Forest Management Act (FMA)* and the *Environmental Protection Act (EPA)* and provides the following comments and recommendations for your consideration.

**General Comments**

Based on the information that has been submitted and a review of the background report submitted as part of the community's water license submission last year, we would like to provide the following comments for the Board's consideration:

- If the new landfill is approved, are there plans in place for the abandonment and restoration of the existing solid waste facility as per Section G of the Water License?
- Part I: *Conditions Applying to Operation and Maintenance* of the Hamlet's current Water License states that the Hamlet shall submit to the Board for approval a revised plan for the Operation and Maintenance of the Sewage and Solid Waste Disposal Facilities (O&M Plan). ENR recommends that the Hamlet submit a revised O&M Plan for the new landfill that addresses all the items in the license including the following sections:
  - a) Treatment of contaminated drainage.
  - b) Prevention of windblown debris. Although the proposed new landfill has a permanent perimeter fence that is 1.8m in height, this is not enough to prevent

debris (i.e. litter) from becoming windborne. ENR suggests that the Hamlet consider another line of litter prevention by installing a portable fence that is placed directly downwind of the active landfill area. This type of fence is usually 6 m high and can be very effective in minimizing windblown debris.

- c) Managing hazardous waste. ENR encourages the Hamlet to develop a plan for the management of hazardous waste that considers the cost of disposal of hazardous materials that are segregated from general disposal.

For example, the collection of Ozone Depleting Substances (ODSs) from fridges, air conditioners, and other appliances requires servicing by a certified technician. ENR has developed a *Guideline for Ozone Depleting Substances and Halocarbon Alternatives* to manage ODSs<sup>1</sup>.

The segregation of used oil requires collection and containment in the form of drums or tanks as well as consideration of ultimate disposal. ENR has developed the *Used Oil and Waste Fuel Management Regulations*<sup>2</sup> and a plain language guide<sup>3</sup> to outline options for heat recovery by incineration.

ENR also asks that the Hamlet consider safety along with disposal issues for the above-mentioned materials as well as for batteries, propane tanks, paint and solvents. We are willing to work with the Hamlet of Fort McPherson in developing a plan that is practical and can be reasonably achieved in order to prevent the release of contaminants into the environment. If you have any further questions regarding the management of hazardous waste, please contact Gerald Enns at (867) 920-8044.

- In the main site plan (C-01), a landfarm cell is proposed in addition to the existing landfarm. ENR would like to know what, if any, plans are in place for the management of water that will be impacted with hydrocarbons that may accumulate in the landfarm. If the new landfill is approved, ENR recommends that a Landfarm Management Plan be submitted to the Board for approval to ensure that the landfarm will be managed properly and that it does not become a long-term storage facility for hydrocarbon-impacted soil and/or other hazardous waste. ENR also recommends that access to the landfarm be restricted to maintenance personnel and that the gate be locked all other times. This will prevent dumping of improper materials in the landfarm.
- In the main site plan (C-01), there are two gated entrances to the landfill. ENR recommends that the Hamlet consider having an attendant at the landfill during operating hours and locking the gates during non-operating hours.

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<sup>1</sup> <http://www.enr.gov.nt.ca/eps/pdf/Guideline%20for%20Ozone%20Depleting%20Substances%20-%20June%202007%20Final.pdf>

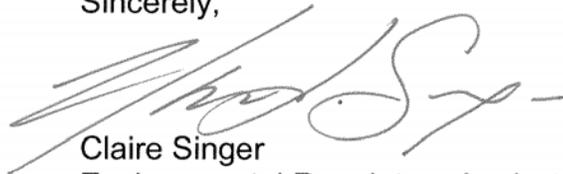
<sup>2</sup> [http://www.enr.gov.nt.ca/eps/pdf/oilwastefuel\\_nov03.pdf](http://www.enr.gov.nt.ca/eps/pdf/oilwastefuel_nov03.pdf)

<sup>3</sup> [http://www.enr.gov.nt.ca/eps/pdf/plg\\_oilwastefuel\\_nov03.pdf](http://www.enr.gov.nt.ca/eps/pdf/plg_oilwastefuel_nov03.pdf)

- If the new landfill is approved, ENR recommends that new SNP station(s) be developed to monitor run-off from the facility.
- In the main site plan (C-01), please indicate the meter (m) on the scale.
- In the Waste Facilities Cross Section (C-04), in Section B, the number “3” is missing at the end of the “Proposed MSW Cell”.

Should you have any questions or concerns with regards to the above, please do not hesitate to contact Claire Singer, Environmental Regulatory Analyst, at (867) 920-6591 or [Claire\\_Singer@gov.nt.ca](mailto:Claire_Singer@gov.nt.ca).

Sincerely,



Claire Singer  
Environmental Regulatory Analyst  
Environmental Assessment and Monitoring  
Environment and Natural Resources

**C.C.**

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Solid Waste Specialist  
Environmental Protection

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Hazardous Waste Specialist  
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