



RE: Town of Inuvik Municipal Water Licence Renewal Application – G017L3-001

GRRB staff have reviewed this application and has identified gaps in the information provided. We offer the following comments and recommendations for the consideration of the Board

Recommendation – 5 year term renewal

- Staff recommend a 5 year renewal term be approved, rather than a 10 year renewal term as requested, in order to address the gaps indicated below and to make revisions or to obtain more information as needed

Additional staff comments

- Staff notice in the Detailed Compliance Table of the Municipal Water Licence provided that a Sewage Management Plan is required under Part B, item 11 and was due July 1, 2011 and is still outstanding.
- Staff notice in the Detailed Compliance Table of the Municipal Water Licence provided that the water intake fish screen is the improper size and this has been outstanding since 2011.

Recommendation: Provide update on status of these actions.

- No hazardous waste management plan has been submitted with the current application.

Recommendation: a hazardous waste management plan be submitted

- The Sewage Treatment Facility Operations and Maintenance (OM) Manual provided appears to lack current information. References cited are from 1993 and earlier.
 - For example, the OM manual refers to a 1993 sludge transfer operation and states that accumulation needs to be monitored by survey every two or three years. Have there been more recent sludge transfer operations? What were the results? At what frequency is the rate of accumulation monitored and surveyed?

Recommendation: update the Sewage Treatment Facility Operations and Maintenance manual

- The Inuvik Landfill is an attractant for bears. This creates a hazard for people and increases mortality to bears that have become habituated to this source of food and are then killed by wildlife officers. Grizzlies were assessed as a species of *Special Concern* under the federal Species at Risk Act in 2012 and will be assessed by the NWT Species at Risk Committee in April 2017. The solid waste management plan does not address alternatives to lethal dispatch of habituated bears, such as fencing or other bear deterrents that are used successfully elsewhere.

Recommendation: investigate bear deterrent methods and other alternatives to killing bears at the Inuvik Landfill.

- Staff request more information about the surface drainage from the Baldy Landfill. According to the map provided in Fig 2.1 (p26) of the application, there appears to be an ephemeral stream that may drain into Boot Creek and ultimately into Boot Lake, upstream of the water intake pipe. As permafrost warming and melt increases due to anticipated long term climate changes, it is expected there will be changes to current surface and subsurface drainage patterns.

Recommendation: that additional SNP surface water monitoring stations be established at Boot Creek where it drains into Boot Lake as well as where Boot Creek drains out of the lake and into the East Channel upstream of the water intake pipe.

Recommendation: that groundwater monitoring stations be established upstream of the water intake pipe as well as along the outflow of the effluent from the sewage lagoon

- In Section 3: Projected Outlook and Trends of the Submission in support of Inuvik's Application there is no discussion of potential impacts of melting permafrost on Inuvik's water supply and infrastructure or sewage effluent and infrastructure

Recommendation: that research be conducted into potential permafrost effects and a long term permafrost mitigation plan be developed

- Staff request additional information on the spill response plan and have the following questions. Who does inspections to ensure sites have fully stocked spill response kits? What materials are used? Are personnel trained with hands-on practice, and regularly updated on new technologies or spill response procedures?

If you have any questions about the GRRB response to this application please contact me by email at jboxwell@grrb.nt.ca or by phone at 9867) 777-6600 ext 5

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Gwich'in Renewable Resources Board