



Environment Canada  
Prairie and Northern Region  
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Yellowknife, NT X1A 2N4

March 15, 2010

Our File: 4782 009

Mackenzie Valley Land and Water Board  
P.O. Box 2130  
7th Floor - 4910 - 50 Ave.  
Yellowknife, NT X1A 2P6

By Email

Attention: Shannon Hayden

**Re: Town of Hay River – Draft Type A Water Licence - MV2009L3-0005**

Environment Canada (EC) staff have reviewed the draft water licence, and provide the following comments for your consideration.

**Part A. Scope**

Add the descriptor “W” after the longitude.

**Part A Definitions Page 2**

The definition of “**Surveillance Network Program**” is too narrow in its current wording. Suggested changes in text are showed in italics below:

“**Surveillance Network Program**” means a monitoring program established to collect data on surface water and groundwater quality to assess *discharge quality and licence compliance, as well as the potential for impacts to the environment.*

**Part B. General Conditions**

**B.1** Italicize “Northwest Territories Waters Act”

**B.3** EC recommended in our intervention that the Annual Report be submitted for approval by the Board, and the Town agreed to this in their response of January 14<sup>th</sup>. Accordingly, we suggest that this licence condition be amended to read “The Licensee shall file an annual report with the Board *for approval* not later than...”

**Part D. Conditions Applying to Waste Disposal**

**D.3** Reword slightly to include the pass rate; the type of test is specified in the SNP section.

“Acute toxicity – Rainbow trout: 70% survival of test organisms”

**D.4** The report doesn’t necessarily need to be completed by an engineer; the data will be from an accredited lab and other disciplines (chemist, biologist, statistician) would be able to report the relationship.

**D.15** For clarity, the term “surveyed description” should be elaborated upon. The description is required in order to understand the area which is actually providing treatment, so rather than a block of land being delineated it would be useful to describe the wetlands in terms of hydrological patterns, including an evaluation of where sewage

is flowing and identification of what portion of the wetland is impacted. This information is necessary to ensure that the compliance point being used is the correct location.

**Schedule B.1** The section referred to should be Part b, Item 3.

**Schedule F. Conditions Applying to Closure and Reclamation**

1.k could be reworded for clarity by replacing “of how” with “regarding”.

**Schedule H. Conditions Applying to Operation and Maintenance *Plans***

(add the word “Plan” as above)

**Surveillance Network Program**

Stations:

0053-5 *Runoff* or seepage from the solid waste disposal site.

How does the groundwater well sampling fit in with this? For clarity, specify “surface” runoff or seepage, and add a station for the groundwater wells?

0053-7 and -8 Correct the typo for Rationale

Sampling and Analysis Requirements:

2. Add the phrase “for Acute Toxicity” after “shall be sampled” to differentiate this sampling from that required in Item 1.

There are no requirements for sampling of Station 0053, which is the discharge point from the lagoons to the wetlands. EC still feels sampling would provide useful management information, and recommends at a minimum, sampling be required at this station at least twice annually, and suggest mid-summer and late in the treatment season.

Notes:

Footnote 2 - Move Dissolved Oxygen to the line below in the table.

Footnote 4 – put Sulphate and Total Hardness on separate lines.

Ambient conditions should be routinely recorded at the time of sample collection (wind, precipitation, temperature).

Please do not hesitate to contact me at (867) 669-4735 with any questions or comments regarding the foregoing.

Yours truly,

Anne Wilson  
Water Pollution Specialist  
Environmental Assessment - North,  
Environmental Protection Operations

cc: Carey Ogilvie (Head, Environmental Assessment-North, EPOD)  
Mary Kelly (Physical Sciences Officer, EPOD)