

Elaine Briere - MVLWB

From: Lynn Carter - MVLWB [lcarter@mvlwb.com]
Sent: Thursday, March 11, 2010 8:57 AM
To: permits@mvlwb.com
Subject: FW: Draft Water Licence for the City of Yellowknife
Attachments: Reformatted - EC's comments on the City of YK Draft WL.doc

MV2009L3-0007

Sent following a request to Environment Canada to re-format their comments without using Track Changes.
LC

From: Fitzgerald,Jane [Yel] [mailto:Jane.Fitzgerald@EC.GC.CA]
Sent: Tuesday, March 09, 2010 2:35 PM
To: Lynn Carter - MVLWB
Cc: Wilson,Anne [Yel]
Subject: RE: Draft Water Licence for the City of Yellowknife

Lynn,

Attached are EC's comments on the Draft WL for the City of Yellowknife, reformatted as individual comments. Page numbers provided are based on the PDF document of the Draft WL that you had original sent out for review and I have not included any of the formatting comments provided in the edited word document, as they were not applicable to the PDF document.

Let me know if you have any further questions.

Jane

Part 2; Page 2

The definition of “**Sewage Disposal Facilities**” should be extended to specify the inclusion of Lake F3 as that is the compliance point, and some thought should be given to identifying the wetlands component part of the system which extends to 0032-F1.

Part 2; 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 D, item 24; Page 7

The report indicated in Part D, item 24 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.

Part D, item 26; Page 8

Suggested changes in text to Part D, item 26 are showed in italics below:

The Licensee shall, by March 31, 2013, complete and submit to the Board for approval a study to understand metal concentrations in surface water in the vicinity of the Solid Waste Disposal Facilities. *The study should include recommendations for mitigation measures should the metal concentrations be linked to a solid waste source.*

Part H, item 2; Page 9

EC suggests that there be a clause stating that if the Plan is not approved, a timeline for resubmission (e.g. 90 days) be included.

Schedule B, item I; Page 11

Item I. overlaps with g. and h., and could be clarified by terming this the “general” O&M plan, assuming it refers to O&M for all other municipal activities.

Schedule H; Page 15

Are there general practices that would also belong in an O&M plan, such as the water treatment operations?

Surveillance Network program**Part A, Station Number 0032-10; Page 18**

Monthly sampling for the parameters required in SNP Item B.1 would inform system operators of changes to primary treatment achieved as well as identify the treatment contributions of the system components between F6 and F3 outflows. This information would be helpful for informing sludge management.

Surveillance Network program**Part B, item 1; Page 20**

The parameters ammonia and phosphorous should be removed from the list of items to be analyzed at Station numbers 0032-F1 and 0032-F3 as they are already included under the term nutrients.

Surveillance Network program**Part B, item 2; Page 20**

Regarding the use of a static LC₅₀ bioassay, as long as the tests are continuing to pass, the LC₅₀ test does not provide any additional information, but does incur significantly higher costs and requires larger sample volumes. EC recommends the pass/fail test be used, with a "fail" (i.e. less than 70% survival) triggering an LC₅₀ test.

Surveillance Network program**Part B, item 7; Page 21**

The standard 24 or 25 element scan done by Taiga Lab could be listed in conjunction with stating 'ICP-MS Metal Scan' for completeness.

Annexe A Schedule**Part D, item 21; Page 25**

Replace 'Sewage Disposal Facility Reporting' with 'Current Record Drawings' and replace 'Within 18 months of issuance of Water Licence' to 'Within 6 months of issuance of Water Licence'.

Annexe A Schedule**Part D, item 22; Page 25**

Replace 'Current Record Drawings of the Sewage Disposal Facilities' with 'Investigation of algal blooms and pH, for mitigation development' and replace 'Within 6 months of issuance of Water Licence' to 'Within 18 months of issuance of Water Licence'.