

## Rhonda Miller - MVLWB

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**From:** Kathleen Graham [kgraham@mvlwb.com]  
**Sent:** May-31-11 11:43 AM  
**To:** permits@mvlwb.com  
**Subject:** MV2011L3-0001 - Town of Ft. Smith renewal - ENR Comment table  
**Attachments:** REVIEWER Comment Table.xlsx

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**From:** Patrick Clancy [mailto:Patrick\_Clancy@gov.nt.ca]  
**Sent:** Monday, May 30, 2011 4:38 PM  
**To:** Kathleen Graham  
**Subject:**

As I indicated the letter is our official response...

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**GENERAL INSTRUCTIONS FOR EXCEL TEMPLATE:**

1. Do not leave blank rows above or between comments.
2. Do not modify or delete the instructions or the column headings (*i.e.* the grey areas).
3. Each comment must have an associated topic and recommendation.
4. All formatting (*i.e.* bullets) will be lost when this file is uploaded to the Online Comment Table.
5. If necessary, adjust the cell width and height in order to view all text.
6. Cutting and pasting comments from WORD documents cannot include hard returns (spaces between paragraphs).
7. If you would like to create paragraphs within a single cell, please use a proper carriage return (ALT & ENTER).

**TOPIC**

**COMMENT**

*Be as specific as you think is appropriate; for example a section or page of the document, a recommendation #, general comment, etc.*

*Comments should contain all the information needed for the proponent and the Board to understand the rationale for the accompanying recommendation.*

TOPIC 1: OPERATIONS AND MAINTENANCE PLAN	The purpose of an Operations and Maintenance (O&M) Plan is to assist community staff in the proper operation and maintenance of their waste
TOPIC 2: SPILL AND CONTINGENCY PLAN	ENR notes that the community does not have a Spill and Contingency Plan filed on the registry. As part of the previous water licence term and
<b>Topic 3: Closure and Reclamation Plan</b>	ENR understands that a Closure and Reclamation Plan (C&R Plan) for the current SWDF is not in place. The early stages in the development of a

TOPIC 4: HAZARDOUS WASTE  
MANAGEMENT

Comment 1 – Landfarm

ENR understands that the landfarm was built in 2001 by the Department of Public Works and Services (PWS), GNWT for the remediation of hydrocarbon-contaminated soil originating at the Aurora College. The landfarm has since been registered in the name of PWS and managed by the Town of Fort Smith. The Background report states that the registration of the landfarm is currently being transferred to the Town. However, it is not clear what the present state of the hydrocarbon-contaminated soils in the landfarm is, and whether or not hydrocarbon-contaminated soils are currently accepted and managed from other spills within the community.

TOPIC 4: HAZARDOUS WASTE  
MANAGEMENT

Comment 2 – Uranium Burial Site

ENR understands that there is a uranium burial site located at the landfill that was established in 1998 by Atomic Energy of Canada Ltd. (AECL). However, other than the brief description in the Background Report, there is no specific information provided on the burial site such as details on: design and construction; volume and characteristics of soil or materials buried; and a monitoring program. Furthermore, ENR understands that AECL manages the site but is unaware of any formal relationship or agreement established between AECL and the Town of Fort Smith.

TOPIC 4: HAZARDOUS WASTE  
MANAGEMENT

Comment 3 – Hazardous Waste Management Plan

Hazardous waste is generated by both the Industrial, Commercial, and Institutional (ICI) sectors as well as by residents. The plan does not clearly state the types of hazardous wastes that are accepted by the ICI sector and which are not. For example, hydrocarbon-contaminated soils, or asbestos may be accepted from the ICI sector where solvent, pesticides, corrosive liquids, etc. would not be accepted from the ICI sector and only from residents.

Comment 4 – Household Hazardous Waste Collection

ENR can provide assistance with household hazardous waste collection events. The images in Figure 6 of the 2004 O&M Plan do not present a disposal option for the variety of household hazardous wastes generated by residents. Household hazardous waste can be collected through various forms, or combinations of services like HHW collection events, HHW drop off by appointment, or collection of HHW on a regular basis at a depot.

TOPIC 4: HAZARDOUS WASTE  
MANAGEMENT

<p>TOPIC 4: HAZARDOUS WASTE MANAGEMENT</p>	<p>Comment 5 – Record Keeping</p> <p>Hazardous waste generated from the ICI sector is required to be transported to registered receiving facilities in the province or territory of destination and tracked on hazardous waste movement documents according to the Guideline for the General Management of Hazardous Waste in the NWT. The Town of Fort Smith has been registered as a receiver for waste asbestos by ENR.</p>
<p>TOPIC 5: EXTERNAL WASTE</p>	<p>Comment</p> <p>ENR is unclear as to whether the Town accepts outsourced industrial waste.</p>
<p>TOPIC 6: GROUNDWATER AND SURFACE WATER QUALITY AT THE SOLID WASTE FACILITY</p>	<p>Comment (s)</p> <p>Since the last water licence was issued in 2003, two reports were commissioned by the Town to evaluate and assess the surface and</p>
<p>TOPIC 7: LANDFILL GAS</p>	<p>Comment (s)</p> <p>Landfill gas is composed of a mixture of hundreds of different gases. By volume, landfill gas typically contains 45% to 60% methane and 40% to 60% carbon dioxide. Landfill gas also includes small amounts of nitrogen, oxygen, ammonia, sulfides, hydrogen, carbon monoxide, and nonmethane organic compounds (NMOCs) such as trichloroethylene, benzene, and vinyl chloride.</p> <p>Landfill gas can pose significant health and safety issues - specifically, issues related to possible explosion and asphyxiation hazards, odors, and</p>

**RECOMMENDATION**

*Recommendations can be for the proponent or for the Board. Recommendations should be as specific as possible, relating the issues raised in the "comment" column to an action that you believe is necessary.*

1. ENR recommends that an Operations and Maintenance Plan is updated and submitted to the Board for its approval. It should be noted that the water licence also requires an

The Town of Fort Smith prepare and submit to the Board for approval and Spill and Contingency Plan.

Although the current SWDF is expected to have a lifespan of at least another 20 years, ENR recommends that the Proponent prepare and submit an Interim Closure and

## Recommendations

1. The Town of Fort Smith formally take ownership and management of the landfarm and additionally obtain the services of a qualified professional to monitor and determine whether hydrocarbon-contaminated soils accepted at the landfill site are remediated to meet the appropriate land use criteria in the Guideline for Contaminated Site Remediation .
2. The Town of Fort Smith register as a receiver of hydrocarbon-contaminated soils and manage hydrocarbon contaminated soils as a hazardous waste according to the Guideline for the General Management of Hazardous Waste in the NWT .

## Recommendations

1. Provide details on the design and construction of the site, volume and characteristics of the soil and materials buried, including laboratory analyses, and the monitoring program. In the case no monitoring program for the uranium burial site exists, one should be established.
2. Establish a formal relationship and agreement between the Town of Fort Smith and AECL to clarify responsibility for the management of the uranium burial site including ongoing operations and maintenance, monitoring, etc.

#### Recommendations

The Town of Fort Smith develop a comprehensive hazardous waste management plan that clearly states which of the following materials will, and will not be accepted at the solid waste facility, and from which sector.

- Asbestos
- Batteries (Lead Acid)
- Glycols (Antifreeze, Heating Fluid)
- Heating Oil Tanks
- Household Hazardous Waste
- Hydrocarbon Contaminated Soil / Snow / Water
- Mercury Containing Materials
- Oil Debris
- Old Fuel

#### Recommendations

The town included details about the type household hazardous waste collection as part of a comprehensive hazardous waste management plan and establish at least one day a year for HHW collection.

Recommendations

The Town of Fort Smith utilizes hazardous waste documents provided by ENR to track and record the hazardous wastes received at their facility from the ICI sector

Recommendations

ENR recommends that no industrial waste sourced from outside the community be accepted at the landfill. If the Town does accept industrial waste streams sourced from outside the community, then analysis of these waste streams must be provided, along with evidence that any community facility will be designed, operated, funded and licensed to mitigate and appropriately manage these activities and associated liabilities.

1. It is recommended that a study be completed to determine the origin of the elevated metals concentrations and whether a) landfill leachate is migrating offsite, b) the

Question(s)

Has the Town of Fort Smith conducted, or is it considering any form of landfill gas assessment?