

Rhonda Miller - MVLWB

From: Kathleen Graham [kgraham@mvlwb.com]
Sent: May-30-11 11:21 AM
To: permits@mvlwb.com
Subject: FW: MV2011L3-0001 - Fort Smith WL renewal
Attachments: YELLOWKN-#463883-v1-RC_-_WL_-_M_-_FORT_SMITH_(T_OF)_WL_RENEWAL_(COM-T).XLS

From: Jeanne Arsenault [mailto:Jeanne.Arsenault@inac-ainc.gc.ca]
Sent: Friday, May 27, 2011 5:27 PM
To: kgraham@mvlwb.com
Cc: Wayne Starling
Subject: MV2011L3-0001 - Fort Smith WL renewal

Dear Ms. Graham,

Thank you for the opportunity to provide comments for the Town of Fort Smith Water Licence renewal, MV2011L3-0001. If you have any questions or concerns please contact either myself Jeanne Arsenault at (867) 669-2658 Jeanne.Arsenault@inac-ainc.gc.ca or Mr. Wayne Starling at (867) 872-2558 Wayne.Starling@inac-ainc.gc.ca.

Thank you,

Jeanne
Jeanne Arsenault
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GENERAL INSTRUCTIONS FOR EXCEL TEMPLATE:

1. Do not leave blank rows above or between comments.
2. Do not modify the instructions or the column headings (i.e. the top three rows).
- 3. Each comment must have an associated recommendation.**
4. All formatting 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.

Annual Reporting	Part B, Section 1 of the water licence refers to the elements to be included in the annual report.
Snow Disposal Plan	The current water licence does not have a condition relating to snow disposal.

Operation and Maintenance Plan	An Operation and Maintenance (O&M) Plan relating to Solid Waste Landfill Site and Sanitary Sewage System was first prepared by the Town in August 1999. An updated version focusing mainly on Solid Waste Management Facilities was prepared in August 18, 2004.
Spill Contingency Plan	INAC understands that the Town is currently developing a Spill Contingency Plan.

<p>SNP - Sampling and Analysis Requirements</p>	<p>The Town currently tests for BOD at SNP 567-2. Currently, the CCME Municipal Wastewater Strategy for the Treatment of Municipal Wastewater Effluent uses CBOD as an indicator for the quality of municipal wastewater. INAC recommends that both parameters be sampled for a specified period of time within the renewed water licence. This would maintain the existing long-term BOD dataset collected by the Town, but also have a period of overlap with CBOD analysis, which would provide information relevant to the upcoming CCME requirements, as well as provide a relationship to the long-term BOD dataset.</p>
<p>SNP - Groundwater wells monitoring</p>	<p>The Town of Fort Smith has been collecting groundwater water quality data intermittently since 2001. The “Fort Smith SWDF 2008 Groundwater Monitoring” prepared by IEG Consultants suggests that in absence of any data indicating a geological variability across the SWDF, elevated concentrations of salts and metals suggests impact from landfill to groundwater. It also indicates that as surface water is likely a receptor to groundwater discharge north of the SWDF, monitoring impacts to the surface water quality is key in assessing potential offsite environmental impacts of the SWDF. Following a study by AECOM (then Earth Tech) in 2006, the MVLWB accepted a revised sampling protocol for the groundwater monitoring wells. Groundwater sampling was therefore reduced from twice to once a year; the numbers of wells to be sampled were reduced from 16 to 11, and the parameters to be sampled reduced to groundwater elevation, pH, sulphate, sodium, chloride, major ions and ICP-MS Metal Scan (Dissolved).</p>

Water Licence Conditions

INAC recommends that the conditions in the existing licence stay the same with the exception of a the following revisions:

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.

INAC recommends that the following be also included in the annual report:
Results of any inspections of all dams, berms, dykes and control structures;
Updates or revisions of the upcoming snow disposal plan; Sludge management details if any; Comparison of the Surveillance Network Program data to the water licence regulated limits and sampling and analysis requirements;
Correspondence between the Inspector and the Town and Groundwater monitoring results.

The Town of Fort Smith should provide to the Board a map outlining areas (with UTM positioning) currently used or to be used for snow disposal. The drainage pathways of the meltwater should also be indicated. This snow disposal plan should be reviewed yearly and any additions or deletions to areas used should be identified in the Annual Report.

INAC-WRD recommends that the O&M plan be revised to also include the following:

- Wastewater collection system;
- Hazardous Waste Management Plan that should be completed in general accordance with Government of the Northwest Territories; Department of Environment and Natural Resources 2009 Developing a Community Hazardous Waste Management Plan
- A map of all existing and planned Surveillance Network Program stations (as the one provided in the application – Figure 9) including the latitude and longitude of each stations.
- A Quality Assurance/Quality Control Plan for “Surveillance Network Program” sampling. The Quality Assurance/Quality Control Plan for sampling and transport of water samples shall be completed in accordance with Indian and Northern Affairs Canada’s “Quality Assurance (QA) and Quality Control (QC) Guidelines” for Use by Class “A” Licensee in meeting Surveillance Network Program Requirements and for Submission of a QA/QC Plan
- A copy of the Water Licence

The Town may refer to the Guidelines for Spill Contingency Planning produced by INAC Water Resources Division in 2007 to provide further guidance on the recommended level of detail to be included in Spill Contingency Plans. These guidelines can be found at http://nwt-tno.inac-ainc.gc.ca/wrd-gl_e.htm and hard copies can be obtained from the Water Resources Division by contacting Jeanette Hernberg at Jeanette.Hernberg@inac.gc.ca.

INAC recommended that CBOD be added to the list of parameters to be sampled for 567-2 in Part B. Section 1.

- INAC-WRD recommends a revision of the protocol and the parameters sampled to ensure that the integrity of the groundwater source is adequately protected, without incurring unnecessary costs to the Town.
- As also suggested in the 2008 report by IEG Consultants, it is recommended that the BH-04 be retrofitted and redeveloped to reduce the presence of sand and silt in the water of the monitoring well.

Part A - Scope & Definitions

- Average Concentration For Faecal Coliform should be changed to “means the running geometric mean of any four consecutive analytical results submitted to the Board in accordance with the sampling and analysis requirements specified in the Surveillance Network Program”;
- Freeboard should be changed to “means the vertical distance between the water line and the lowest elevation of the effective water containment crest on a dam or dyke’s upstream slope.

Part B - General Conditions

- Section 1, item 5, should be re-worded to read “The licensee shall maintain, to the satisfaction of an inspector, the necessary signs to identify the stations of the Surveillance Network Program.

Part I - Spill Contingency Planning

- Part I, Condition 1, of the water licence should refer to INAC’s new “Guidelines for Spill Contingency Planning” April 2007.
