



*Sambaa K'e First Nation*  
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**RE: Sambaa K'e First Nation comments on MV2018:3-0001 – SKFN - Draft Water Licence Terms and Conditions**

Dear Erica Janes:

I would like to submit the following comments on behalf of Sambaa K'e First Nation (SKFN) in regards to the draft SKFN water licence terms and conditions. These comments have been prepared after, and emerging from, detailed review of the draft water licence with Sambaa K'e First Nation leadership and staff representatives: Chief Dolphus Jumbo, Environmental Coordinator and SKFN Councillor Jessica Jumbo, Senior Administrative Officer Ruby Jumbo and SKFN Councillor and Community Works Coordinator Brian Kotchea on Friday November 9<sup>th</sup>, 2018.

**Topic 1: General Conditions**

*Comment:* Part B, item 15 as drafted requires that the Licensee submit an annual water licence report to the board beginning June 30, 2019 and every June 30, thereafter. In its comments, the Board requests feedback on this timing as opposed to March 31st of each year.

*Recommendation:* SKFN requests that the June 30, 2019 reporting date as drafted be maintained as most fiscal year-end reporting is due March 31<sup>st</sup> or shortly thereafter, already stressing SKFN's capacity at that time of year.

## **Topic 2: Conditions applying to waste and water management**

*Comment:* Part D, item 10 is drafted as requiring the proponent to submit results from the sewage facility 10 days prior to discharge. Currently, SKFN submits results to the Inspector and waits for authorization prior to decant. SKFN can copy the Board on these communications but currently decants are almost always done on an emergency basis. SKFN would prefer that criteria for authorizing a decant are clear, transparent and consistent so that SKFN staff can make that call independently based on results of the water samples. SKFN would prefer that Inspector authorization be required only if sample results do not meet a given criteria and an exception is being sought (for instance, an emergency decant is required.)

*Recommendation:* SKFN can request that the analyzing lab copy results to the Board and to the Inspector. SKFN recommends that five days is sufficient prior to decant. SKFN further recommends that the requirement for Inspector authorization be removed and that criteria be established so that SKFN's Environmental Coordinator can make that decision if criteria are met and that otherwise, written authorization of an Inspector be required.

## **Topic 3: Schedule 1 Annual Water Licence Report**

*Comment:* Schedule 1 lists the components of the required annual report. 1b requires a summary of monthly and annual quantities in cubic metres of each and all waste discharged to the waste disposal facilities. SKFN can provide estimates of solid waste and liquid waste by tallying the number of truckloads of waste delivered to the site. As the facility is not manned, more detailed records cannot be provided.

*Question:* Please confirm that such estimates would suffice.

## **Topic 4: Schedule 1 Annual Water Licence Report**

*Comment:* Schedule 1 lists the components of the required annual report. 1d requires a summary of sludge management activities including results of depth and volume measurements, sludge removal and treatment. SKFN already knows that its current sewage lagoon is well beyond its design life and annual sludge depth measurements are difficult and will not provide further useful information (the sludge sits in a concave shape and a reasonable depth measurement cannot be obtained from shore.) Once a new lagoon is constructed, SKFN feels that depth measurements would also not be necessary unless something triggered investigation (for instance, challenges maintaining lagoon freeboard or meeting effluent discharge criteria).

*Recommendation:* That reporting on sludge management activities including depth and volume measurement be required only when applicable.

## **Topic 5: Schedule 1 Annual Water Licence Report**

*Comment:* Schedule 1 lists the components of the required annual report. 1b requires that SKFN report the monthly and annual quantities in cubic metres of each and all Waste discharged to the Waste Disposal Facilities, by location and including sludge from the Water Supply Facilities. SKFN's water treatment plant does not produce sludge. It does not use conventional water treatment but rather is a membrane system. A small amount of coagulant is injected upstream of the membranes to remove colour, but there is no sludge. The backwash does contain suspended solids, but it is not captured or concentrated. SKFN will submit the detailed original manufacturer's O&M manuals for the water treatment plant to the Board.

*Recommendation:* That the requirement to include reporting on monthly and annual quantities of sludge from the Water Supply Facilities be removed.

## **Topic 6: Draft Annex A: SNP**

*Comment:* The draft SNP annex requires monthly sampling of water treatment plant backwash for aluminum. Although this testing can be done on-site, the water treatment plant coagulates to treat colour, which is fairly consistent year-round. The SKFN Water Treatment Facility draws from a reservoir that is filled annually so water is not subject to seasonal variations that would occur if water were drawn directly from a river or lake. As substantial variability in results is not anticipated, we feel that monthly sampling is unnecessarily onerous for community staff. Though it can be completed on-site, the procedure still requires multiple steps and takes some time for staff whose plates are filled already with basic community service delivery. I have discussed this with ENR staff person Justin Hazenberg and encourage Board staff to contact him if there are further questions.

*Recommendation:* That sampling of water treatment plant backwash be required no more than twice annually. The first can be shortly after the reservoir is filled and the second time 6 to 9 months later.

Please do not hesitate to contact me at the coordinates listed below with any questions regarding these comments and recommendations. Inquiries can also be directed to SKFN's Environmental Coordinator, Jessica Jumbo, at [environment@sambaakefn.com](mailto:environment@sambaakefn.com) or (867) 206-2800

Thank you for all of your and your colleagues' work on this licence to date.

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