



## Sahtu Land and Water Board

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Our File#: S18L3-001

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### Re: Notice of Compliance Concerns with Municipal Water Licence S18L3-001

Compliance with Water Licences has been an ongoing concern with many communities across the NWT. In 2015, Municipal Water Use Inspections were conducted by the GNWT Water Resources Inspector in each of the licensed Sahtu communities. As well, Board staff participated and provided licence-specific Surveillance Network Program (SNP) training Manuals, as well as templates for completing Operation and Maintenance Plans for Solid Waste Disposal Facilities (SWDF), Wastewater (sewage) Treatment Systems (WWTS), Water Treatment Plant (WTP), Spill Contingency Plan (SCP) and Annual Water Licence Reports. Board staff also compiled a comprehensive list of compliance concerns and issues for each Water Licence based on review of all Board documentation and Inspection Reports.

The Board issued the 5-year renewal of the municipal Water Licence for the Deline Got'ine Government (DGG) on April 19, 2018 with the DGG and their consultant (Stantec) having addressed the majority of the compliance concerns outlined in the 2015 report. At the time of Licence issuance, the Board required some follow-up revisions to several plans and submission of some outstanding reports. Below is a summary of the Board's directive.

1. The Board approved the **Spill Contingency Plan (SCP)** but required that the flowchart be updated to contain the names and phone numbers of all relevant staff responsible for implementing the SCP; to provide the SLWB with a copy of the updated flowchart to post to the registry; and to post the flowchart in a highly visible location within the Deline facilities. To date we have not received this update.
2. The Board required revisions to and resubmission within 60 days of:
  - the **Operations and Maintenance Manual for the Sewage Lagoon** as per Part D, condition 2;
  - the **Operations and Maintenance Manual for the Solid Waste Disposal Facilities** as per Part D, condition 4.

Table 1, below, outlines the revisions required to these manuals.

Table 1: Revisions required to O and M Manuals

Manual and Information Required	Revision Due Date
<b>Sewage Lagoon Operations and Maintenance Manual</b>	
Include all missing appendices Appendix A Drawings .....A.1 Appendix B Current Water Licence .....B.2 Appendix C INAC Sampling Guide .....C.3 Appendix D Site Inspection Template ..... D.4 Appendix E Laboratory Sampling Requirements ....E.5	June 18, 2018
<b>Solid Waste Disposal Facility Operations and Maintenance Manual</b>	
provide information on the quality of leachate coming from the solid waste disposal facility and any details on collection within the facility.	June 18, 2018
provide information on the proposed closure and reclamation of the temporary solid waste facility to be implemented upon completion of the new solid waste facility.	
the entire Sewage Disposal Facilities (or WWTS), including the wetland portion location in between the new lagoon cells and the receiving environment (Great Bear Lake), and corresponding SNP monitoring station, be visually represented on a map and included within Deline WWTS O&M Plan.	
the font used to represent SNP stations on the “Existing SNP Map” be increased in order to be readable.	
the suggested location for SNP location 0555-5 be revised and represent the Final Discharge Point, located immediately prior to entering the receiving environment of Great Bear Lake.	
Deline’s current WWTS O&M be updated to provide typical WWTS management and information details, such as required in the MVLWB WWTS O&M Template. During the updating process of the WWTS O&M plan, Deline should also refer to the O&M Template Appendix specific to Engineered Lagoons (Schedule C) for further wastewater treatment train specific information.	

3. The Board also required submission of:

- the **Operations and Maintenance Manual for the Water Treatment Plant** as per Part D, condition 5;
- **As-built Report** for the sewage lagoon as per Part E, condition 7;
- the **2017 and 2018 Annual Reports** as per Part B, condition 16, due by March 31 of each year.

To date, we have not yet received any of these submissions for Board approval.

The last Inspection conducted on [June 8, 2018](#), noted several non-compliance issues and concerns to be addressed by the Licensee. These included:

- Submission of Annual Reports (Part B, condition 16);
- Take measures to minimize or eliminate standing water at the new SWDF and temporary SWDF (Part B, condition 18);
- Submit coordinates of the water supply being used for dust suppression (Part C, condition 1);
- Install a sign to identify the Water Supply Facility (Part B, condition 5);

- Temporary hazardous waste containment area needs immediate attention and implementation of best practices for managing hazardous waste at the landfill;
- Install signs at each SNP sampling location for surface and groundwater wells (Part B, conditions 13, 14).

To date, we are not aware that any of these issues and concerns have been addressed.

At the time of the June 2018 inspection SNP training was completed with samples collected from SNP Stations 2,3,4,6 and 7. Results of these samples should be included in the Annual Report.

In 2018, groundwater monitoring wells were installed by MACA (7 wells) as part of the Surveillance Network Program and to implement the Closure and Reclamation Plan for the Deline Landfill. A routine collection of samples from these wells should now be in place.

The Inspector had also indicated in the June 2018 inspection report that SNP Station 0555-2 (Airplane Lake/Little Lake), which was removed from the new Licence, should be re-established due to public concerns. The SLWB will initiate a review process to update the Surveillance Network Program to re-establish an active SNP Station at 0555-2.

The *Waters Act* section 10(1)(a) states that no person shall use, or permit the use of, waters in a water management area except in accordance with the conditions of a licence. The failure to comply with any condition of a Type B Licence, issued under the *Waters Act* is designated as a violation under section 72(1)(a).

The Board expects the Deline Got'ine Government will make every effort to submit outstanding reports and complete actionable items. Please submit a work plan with an implementation schedule for documenting how and when these plans and studies and actionable items will be addressed, prepared, and submitted to the Board.

The full cooperation of the Deline Got'ine Government is appreciated. If you have any questions or concerns, please contact Bonnie Bergsma at (867)496-2778 or [bonnie.bergsma@slwb.com](mailto:bonnie.bergsma@slwb.com).

#### Sahtu Land and Water Board



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