

S20L3-003 - Water Licence Renewal Application Received on October 28, 2020 – Charter Community of Fort Good Hope  
 Concordance Table Comparing July 27, 2020 Board Directive<sup>2</sup> and Renewal Application Documents  
 (prepared by Aswathy Mary Varghese, Regulatory Specialist)

<b>S15L3-002 Licence Condition</b>	<b>Report Title/Topic</b>	<b>Submission Due Date as per July 27, 2020 Directive<sup>2</sup></b>	<b>Submission with Renewal Application<sup>1</sup> (yes/no)</b>	<b>Comments</b>
B.4	Annual Report – 2018 & 2019	Sep 30, 2020	Yes	
B.6	Submission of SNP data; Compliance with the Surveillance Network Program (SNP) as Annexed to Licence.	Mar 31 <sup>st</sup> , every year, along with Annual Report.	No	<p>Outstanding since 2015 (since issuance of the Licence S15L3-002)<sup>2</sup>.</p> <ul style="list-style-type: none"> <li>Many of the SNP groundwater wells are dry (checked by Stantec, licensee’s consultant in June 2020). Most SNP monitoring locations still needed to be validated with results from the Waste Disposal Facilities Pathway Study (S15L3-002, Condition D.18). Since most of the groundwater wells are dry, sampling data from newer groundwater monitoring wells (GNWT-MACA has monitoring wells in FGH dump site, from which SNP data are pending since 2018) are necessary to monitor the health of FGH waste disposal facilities<sup>2</sup>.</li> </ul>

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				<ul style="list-style-type: none"> <li>• SNP sampling is impeded by lack of water in surface sampling locations. SNP sampling continues to have limited success<sup>1</sup>.</li> <li>• The <a href="#">SNP Implementation Guide</a>, as per S15L3-002 WL requirements, and training for SNP sampling was provided by Board staff, GNWT-ENR and Stantec from time to time<sup>1,2</sup>.</li> </ul>
B.7	Proposal to revise the SNP	Sep 30, 2021	No	<p>Outstanding since 2017</p> <ul style="list-style-type: none"> <li>• Applicant/Licensee must have submitted a proposal for a revised SNP within eighteen (18) months after the issuance of water licence S15L3-002.</li> <li>• Water Resource Inspector provided SNP training on May 31, 2018 during the Municipal Water Use Inspection. The follow-up Inspection Report included an up-to-date status Table in p. 6-7 for each SNP station, stating that most</li> </ul>

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				<p>monitoring locations still needed to be validated with results from the Waste Disposal Facilities Pathway Study<sup>5</sup>.</p> <ul style="list-style-type: none"> <li>Applicant has stated that they are unable to revise SNP at this time; they are awaiting 5 years of groundwater monitoring data including that from GNWT-MACA to come up with flow pathway study and SNP revision<sup>1</sup>.</li> </ul>
B.11	Posting signage at all Waste Disposal Facilities	Jul 31, 2021	Addressed; signages not fully placed	<ul style="list-style-type: none"> <li>Signages for Bagged Toilet Waste Area, Segregated Waste Area, and Temporary Hazardous Waste Containment Areas are missing. This was noted in different inspection reports including latest Inspection Report on May 31, 2018<sup>5</sup>.</li> <li>Additional signages awaited – to be transported once the winter road opens<sup>1</sup>.</li> </ul>
D.3	Installation of a permanent method of measurement to monitor the	Jul 31, 2021	Yes; addressed	Applicant/Licensee commits to installing a permanent graduated scale within the

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	Freeboard of the Sewage Disposal Facilities (Exfiltration trench			sewage disposal trench, as described in section 3.2.4 of the Waste Facilities Report submitted with the renewal application <sup>1</sup> .
D.11	Satisfactory maintenance of sewage disposal facilities.	NA	Acknowledged/ addressed	<p>The Sewage Disposal Facilities shall be maintained and operated in such a manner as to prevent structural failure and to the satisfaction of the Inspector.</p> <p>Inspection reports from July 2020 and May 2018 noted that maintenance of sewage disposal facilities is unacceptable <sup>4,5</sup>.</p> <ul style="list-style-type: none"> <li>• The pipe that is used for trucks to drain sewage into the Exfiltration Trench is not structurally sound. There has also been erosion and land slumping around the Exfiltration Trench that appears to be caused by trucks discharging sewage outside of this discharge point.</li> <li>• The drain pipe needs to be repaired to ensure sewage trucks are not discharging away</li> </ul>

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				<p>from this point and further increasing erosion.</p> <ul style="list-style-type: none"> <li>• The current orange fencing that is in place is not adequate for this facility. The fence has mostly fallen down around the Exfiltration Trench and therefore needs to be replaced.</li> <li>• Section 3.2.3 of the Waste Facilities Report submitted with the Renewal Application provides detail of two proposed news dumping stations to be installed (one at each trench). If the proposed design is approved, the licensee will proceed with detailed procurement in winter 2021, with spring 2021.</li> </ul>
D.16	Waste Disposal Facilities Fencing Action Plan	Sep 30, 2020	yes	<p>Plan submitted as Section 4.1.7 and Appendix A of the Waste Facilities Report.</p> <p>The Plan was expected to describe how the Licensee will install and maintain fencing that is capable of capturing windswept Waste, deterring wildlife,</p>

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				and preventing unauthorized persons from entering the site.
D.18	Waste Disposal Facilities Flow Pathway Study	Jul 31, 2021	Acknowledged, not addressed at this time	<p>Applicant/Licensee was expected provide a timeline for flow pathway study to determine appropriate locations for SNP.</p> <p>Applicant/Licensee has proposed to monitor flows and water quality from the currently available groundwater monitoring wells.</p> <p><b>The applicant/ licensee has requested a change to the water licence condition D.18 to reflect the reasonable scope of reporting of groundwater presence and characteristics based on the availability of data.</b></p>
D.20	Commercial and Industrial Operators Waste Management Plan	Sep 30, 2020	No	<p><b>The Plan was anticipated to be submitted with Licence full renewal application<sup>2</sup>.</b></p> <p>The Plan shall describe how the Licensee shall monitor and regulate the volume of Sewage and solid Waste deposited to the Waste Disposal</p>

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				<p>Facilities from commercial and industrial operators working outside the municipal boundaries of Fort Good Hope.</p> <p><b>The Applicant noted that Fort Good Hope currently does not accept wastes from commercial operators or businesses other than those operating within or contracted to Fort Good Hope Charter Community<sup>1</sup>.</b></p>
D.21	Satisfactory maintenance of waste disposal facilities	NA	NA	<p>The Waste Disposal Facilities shall be maintained and operated in such a manner as to prevent structural failure and be maintained to the satisfaction of the Inspector.</p> <ul style="list-style-type: none"> <li>• Inspection reports from July 2020 and May 2018 noted that the Solid Waste Facility is overall in very poor condition<sup>4,5</sup>.</li> </ul>
E.2	Revised Solid Waste Disposal Facilities O&M Plan	Sep 30, 2020	yes	
E.3	Revised Sewage Disposal Facilities O&M Plan	Sep 30, 2020	yes	

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E.4	Revised Water Treatment Plant O&M Plan	Sep 30, 2020	yes	
E.5	Waste Disposal Facilities Report	Sep 30, 2020	yes	
F.1	As-built drawings for Water Treatment and Distribution Facilities and the Temporary Hazardous Waste Storage Area	Sep 30, 2020	No	<p>The as-built drawings were expected from the Licensee within 60 to 90 days of the issuance of WL S15L3-002 in October 2015 (references: conditions F.1 and F.6).</p> <p><b>The Renewal Application letter noted that “These drawings were not prepared at time of construction. Due to current use of these facilities, it would not be possible to prepare as-built drawings.”</b></p>
H.3	Revised Spill Contingency Plan	Sep 30, 2020	yes	
I.1	Interim Closure and Reclamation Plan	Sep 30, 2020	yes	

### References

1. [Cover Letter – Water Licence Application S20L3-003 – Oct 28, 2020](#)
2. [Short \(50-days\) Renewal of Water Licence S15L3-002 – July 27, 2020](#) (Issuance package)
3. [S15L3-002 Water Licence and Conditions](#)
4. [Inspection Report from GNWT-ENR – July 30, 2020](#)
5. [Inspection Report from GNWT-ENR – May 31, 2018](#)
6. [E-mail correspondence – WL compliance issues and WL expiry reminder – Apr 23, 2020](#)