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July 17, 2013

Gwich'in Land and Water Board  
P.O. Box 2018  
Inuvik, NT X0E 0T0

**Attn: Leonard DeBastien, Executive Director**

**RE: Municipal Water Licence G03L3-001  
CLASS B - MUNICIPAL  
Deep Water Lake**

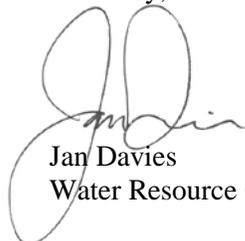
Dear Mr. DeBastien,

Please find the enclosed Inspection Report for your review and records.

An electronic copy (un-editable Adobe pdf.) has also been provided by e-mail.

If you have any questions or concerns regarding the enclosed, and/or if additional information is required please contact me at (867) 777-8909.

Sincerely,



Jan Davies  
Water Resource Officer

Cc: Conrad Baetz, District Manager, North Mackenzie District, Inuvik, NT

Enclosure: Municipal Water Licence Inspection Report and Cover Letter (7 pages)



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July 17, 2013

Hamlet of Fort McPherson  
P.O. Box 57  
Fort McPherson, NT X0E 0J0

**Attn: Susan Blake**

**RE: MUNICIPAL Water Use G03L3-001  
CLASS B - MUNICIPAL  
Deep Water Lake**

Dear Ms. Blake,

An inspection was conducted of the Municipal Water Supply and Waste Disposal Facilities on June 27, 2013. Enclosed is a copy of the Municipal Water Licence Inspection Report.

The Hamlet of Fort McPherson is to be commended for their efforts to improve the Waste Disposal Facilities. While it is understood there are some long standing problems and issues that are being worked on, there are critical items and concerns that need to be dealt with. Further delay will create additional contamination and expense for the Hamlet of Fort McPherson. Unfortunately, there were a number of violations as depicted on page five of the Inspection Report. Many of the violations relate to administrative compliance and can be dealt with promptly. Please review and address the concerns throughout the Report.

While progress has been made on some items there are persistent violations and concerns that upon review of previous Inspection Reports, are consistent with those issues in previous years. Please address the aforementioned items as non-compliance with the Water Licences is a serious matter.

A copy of this report will be sent to the Gwich'in Land and Water Board for their review and public records. If you have any questions/concerns regarding the enclosed, and/or if additional information is required, please do not hesitate to contact me at (867) 777-8909.

Sincerely,

Jan Davies  
Water Resource Officer

Cc: Conrad Baetz, District Manager, North Mackenzie District, Inuvik, NT

Enclosure: Municipal Water Licence Inspection Report (6 pages)



## MUNICIPAL WATER USE INSPECTION REPORT

<b>LICENCE #:</b>	G03L3-001	<b>EXPIRY DATE:</b>	August 31, 2013
<b>LICENCEE:</b>	Hamlet of Fort McPherson	<b>PREVIOUS INSPECTION:</b>	August 19, 2011
<b>COMPANY REP:</b>	Susan Blake	<b>INSPECTION DATE:</b>	June 27, 2013

### WATER SUPPLY

Source:	Deep Water Lake	Quantity Used:	<60,000m3
Owner/Operator:	Hamlet/ GNWT Dept Public Works	Meter Reading:	N/A

**Indicate:**      **A - Acceptable**                      **U - Unacceptable**                      **N/A - Not Applicable**                      **N/I - Not Inspected**

Intake Facilities	A	Storage Structures	A	Treatment Systems	A	Recycling	N/A
Flow Meas. Device	A	Conveyance Lines	A	Pumping Stations	A	Chem. Storage	A
						Modifications	N/A

### **Water Supply Comments:**

Concerns:

1. On the water intake line at the Deep Water Lake Intake Facility there were two small sections of pipe barely exposed through the gravel covering. It is important to monitor these to ensure no further erosion or drainage occurs.
2. During the last Water Licence Inspection in September 17, 2010 the previous outside fuel tank at the Water Treatment Plant had less water within the berm clearly indicating it had been removed. Compared to previous inspections pictures the water level within the berm was greatly reduced. There was a lot of debris present in the bottom of the berm. There was a distinct odour emanating from within the berm that smelled of hydrocarbons and a sheen that was present on the remaining water. The Hamlet of Fort McPherson needs to provide details of where the water was disposed of.
3. See the Fuel Storage Section for additional notes and items of concern.

Notes:

- Previously spilled oil in generator room and onto building skid outside has been cleaned up and contained. Building leveling a few years ago has helped with that according to Shane Debastien, GNWT Settlement Maintenance Supervisor. In the past it was sunken in the corner closest to the fuel tank.
- There were no large erosion channels covering the water intake line as in previous inspections. A water run off/drainage ditch along the side of intake line a metre or two away is performing well so water can drain towards the lake but not on the intake line exposing pipe and causing further damage.
- Intake Facility/Pump Station looked acceptable. Turn around pad is better with no large erosion cracks on the end of the pad where the truck turns around. Continue to monitor erosion and pad stability.

### WASTE DISPOSAL – SEWAGE

Disposal Method	Primary						
Mechanical	N	Camp Sump	N	Natural Water Body	Y	Wetland Treatment	Y
Continuous Discharge	Y	Intermittent Discharge	N	Seasonal Discharge	Y	Land Spread	N
Accelerated Biological	N	Other					

**Indicate:**      **A - Acceptable**                      **U - Unacceptable**                      **N/A - Not Applicable**                      **N/I - Not Inspected**

Discharge Quality	A	Decent Process & Structures	A	Discharge Measurement Device	A
Freeboard	A	Method of Sludge Disposal	N/A		
Periods Of Discharge	Late Fall and/or Spring			SNP Samples Collected	Yes
Effluent Discharge Rates	By volume of water used				
Disposal Method	Primary Treatment				



## MUNICIPAL WATER USE INSPECTION REPORT

Tailings Pond	N	Natural Lake	N	Underground	N	Other	Ex Quarry Pit water body
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**Indicate:**      **A - Acceptable**                      **U - Unacceptable**                      **N/A - Not Applicable**      **N/I - Not Inspected**

Conveyance Lines	N/A	Runoff Diversion	N/A	Dams, Dykes	A
Freeboard	A	Seepages	A	Dyke Inspection	N/A
Erosion	A	Pond Treatment	A	Construction	N/A
Periods Of Discharge	Late Fall and/or Spring			SNP Samples Collected	Yes

**Sewage Comments:**

Notes:

- Dark green colour for sewage lagoon.
- Small trickle of sewage effluent coming out of culvert while the valve is closed. During the last Water Licence Inspection in August 19, 2011 the sewage lagoon wastewater level was higher, especially in relation to the valve which might have related to the increased size of sewage effluent bypass.
- Sewage discharge chute looked in acceptable condition with no erosion or bypass concerns identified from when the sewage truck offloads to the lagoon.
- In the September 17, 2010 Inspection it was noticed there were two sheens on the north end of the sewage lagoon, one by the sewage discharge chute amongst garbage and another located in the northwest corner past the discharge chutes. It was unclear what the source of the sheen was but please note that if a sheen is detected a sample needs to be taken to determine the source. Please note that only grey water and sewage from domestic origins is to be discharged into the sewage lagoon.
- The Sewage Disposal Facility (SDF) needs to be upgraded to effectively address the high ammonia in sewage effluent as mentioned in the Fort McPherson Wetland Study (Ferguson Simek Clark, March 2005).
- The Sewage Disposal Facility could be upgraded with an application to the Gwich'in Land and Water Board to facilitate continuous discharge as opposed to decanting sewage effluent, for example the control valve remains open or the installation of a weir. This would allow a solution to having to decant in the spring and summer seasons. There could also be an application made to the Board in regards to discharging sewage directly to the Sewage Lake where the current piped sewage is entering the lake.

There are a number of different solutions that would provide efficiencies to the current sewage treatment system. As mentioned in the 2004 Annual Report and Study - Performance and Potential Improvements to Anaerobic Lagoon in Fort McPherson (Earthtech, N.W.T. May, 2004) it is suggested that "the sewage treatment "system" for the lagoon discharge could be expanded in the future to include the downstream wetland areas"

**WASTE DISPOSAL – SOLID WASTE**

Disposal Method		Landfill					
Open Dump	N	Landfill	Y	Burn & Landfill	Y	Underground	N
Offsite Removal	N	Other					
Owner / Operator	Hamlet of Fort McPherson						

**Indicate:**      **A - Acceptable**                      **U - Unacceptable**                      **N/A - Not Applicable**      **N/I - Not Inspected**

Runoff Diversion	U <sup>1</sup>	SNP Samples Collected	Yes
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**Solid Waste Comments:**

Concerns:

1. Burning (for acceptable materials) area within drainage ditch for landfill an environmental concern. Burned material leaves ash which any flowing water will flow through and leach out any potential contaminants not to mention this just provides a way for water to get contaminated unnecessarily. This is an impact that can be easily mitigated by moving the burning area to another location at the land fill, for example to the top of the waste cells to the open pit at the top as discussed during the Inspection. This will prevent the drainage and runoff from flowing through burned materials.
2. Currently there are batteries stored at the Solid Waste Disposal Facility (SWDF) that need to be sent out for proper disposal. It might be prudent for the Hamlet to consider collecting batteries at the Hamlet Public Works shop to allow for regular and proper supervision and care for battery collection/storage. Ensure the batteries are collected in the correct method for storage as per the Guideline for the Management of Waste Batteries from the Government of the Northwest Territories – Environment and Natural Resources.
3. Currently there is domestic waste being disposed of at the top of the cell behind the used oil storage area. This area needs to be cleaned up and/or buried because the surrounding garbage is confusing and residents are not disposing of domestic waste all in the



## MUNICIPAL WATER USE INSPECTION REPORT

main cell together. The domestic waste disposal cell should be the only option available and not allow other disposal areas to be used. 4. Windblown debris continues to be an issue as it is getting into the sewage lagoon and needs to be cleaned out. This is a violation of the Water Licence Part D: Conditions Applying to Waste Disposal, Item 8. There needs to be regular covering of domestic waste in the SWDF waste cell and fences installed. When the waste is not covered it creates a larger mess due to being blown around and the problem is further compounded. This ultimately creates large expense to clean up the debris.

5. The contaminated soil storage areas at the SWDF should not be for long term storage but allow for the remediation of soils and their permanent disposal. Contaminated soil while stored in bermed containment cells, still needs to be correctly remediated so it can be properly disposed of. There needs to be regular turning of soil/aeration, sampling, removal of soil for proper disposal. This will ultimately expose other layers of soil to the remediation process and create an efficient soil remediation program.

### Notes:

- At the time of inspection there was no runoff from the Solid Waste and Disposal Facility through the drainage ditch or culvert, but there was evidence it has occurred.
- Acceptable materials (paper, cardboard and untreated wood) are being burned in a burning culvert set up vertically on site. This was below the main solid waste cell. Material is burned when the winds are favourable in order to prevent the rest of the general solid waste catching on fire (please see above comment #1 regarding the location of the burning area).
- It was noticed that there is a great deal of acceptable burnable wood waste in the building/demolition waste disposal area behind the honey bag pit on the north side of the sewage lagoon. This material could be further segregated as there is clean wood present that could either be burned or reused and further decrease the volumes of waste being buried. There could be better signage and education of the Hamlet to instruct them on proper disposal of waste and to encourage better segregation of materials.
- Contaminated soil areas by tire storage area were sampled by Dennis Wright – Hamlet and Gerald Enns – Hazardous Waste Specialist with the GNWT back in 2011. Test pits were dug and samples taken at various depths. Some results were positive and showed that about a metre worth of material off the top of middle surface of the north cell could be removed because it complied with coarse grained soil criteria for Industrial Land Use for the GNWT Guideline for Contaminated Site Remediation. It could be used as landfill cover material. The containment cells need to have the soil turned and tested on a regular schedule.

### FUEL STORAGE

**Indicate:**      **A - Acceptable**                      **U - Unacceptable**                      **N/A - Not Applicable**      **N/I - Not Inspected**

Owner:	Hamlet of Fort McPherson	Operator:	Department of Public Works	Condition of tanks:	A <sup>1,2</sup>
Berms & Liners	N/A	Water within Berm:	N/A	Evidence of Leaks:	No
Drainage Pipes	A	Pump Station and Catchment Berm	A	Runoff Diversion	N/A
Pipeline Condition	A	Not Applicable:	N/A		

### Fuel Storage Comments:

#### Concerns:

1. No leakage or fuel issues were observed at the Deep Water Lake Water Supply Facility except the fuel supply line is feeding into the bottom of the fuel storage tank. This is a concern because if there ever is a leak in the fuel line or where it connects to the base of the fuel tank the contents could empty out completely. This bottom feed tank is a risk to the Deep Water Lake Water Supply in its current state as compared to fuel tank with fuel lines that connect to the top of the fuel tank.

Any leakage is always a risk but in this instance the tank is directly up hill of the lake and if there was ever any shifting of the tank, ground surface etc then leaking fuel could run downhill and be catastrophic for the Hamlet of Fort McPherson's Water Supply. The Deep Water Lake Water Supply Facility fuel storage tank piping needs to be monitored to ensure no maintenance and stability issues.

2. During a previous Water Licence Inspection dated September 25, 2008 it was noticed that the Deep Water Lake Intake Facility gravel pad for the fuel storage tank (a double walled tank mounted on a wood platform) smelled of fuel mainly on the south side of the pad. At the time the GNWT – Public Works and Government Services Canada operations staff who was present mentioned that the south side of the tank with the pipe in the bottom was sunken originally and had to be repaired.

There might have been a leak and/or the tank at times has been overfilled etc. With the fuel/water draining off the tank the gravel area would smell of fuel. Due to the fuel tanks proximity to the water supply it is recommended that there should be an assessment and sampling to determine the concentrations of hydrocarbons if applicable and the extent of contamination if any is present. If necessary the area should be excavated of contaminated gravel and properly disposed of as the presence of this hydrocarbon contamination is a potential risk to the Hamlet's water supply.

#### Note:

- New double walled fuel storage tank at the Fort Mc Pherson Water Treatment Plant. Pipes, tank and nearby area looked acceptable.

### SURVEILLANCE NETWORK PROGRAM

Samples Collected Hamlet	Samples were collected in 2012 and 2013. There has been sampling of SNP 1696-5 (Run-off from SWDF) and 1696-6 (Effluent, combined stream, discharge prior to entering Peel River) and from SNP 1696-3 (Outflow from Sewage Lake). Initial sampling for sewage decant (SNP 1696-2) occurred on May 16, 2013 and a decant was initiated to maintain structural integrity of
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## MUNICIPAL WATER USE INSPECTION REPORT

	the berm and freeboard as per Water Licence Criteria. Further samples were collected on June 10, 18 and 19, 2013.		
Samples Collected AANDC	No samples were taken.		
Signs Posted: SNP	SNP 1696-3 Sewage Lagoon, others not inspected.	Warning	Present for Solid Waste Disposal Facility, Sewage Disposal Facility and Water Supply Facilities.

### Surveillance Network Program Comments:

Note:  
- The Hamlet of Fort McPherson and their Public Works Staff – Ernie Firth are to be commended on their efforts to comply with the Surveillance Network Program (SNP). Samples are being taken to comply with the Water Licence and monitor water quality.

### GENERAL CONDITIONS/REPORTS/PLANS

**Indicate:**      **A - Acceptable**                      **U - Unacceptable**                      **N/A - Not Applicable**                      **N/I - Not Inspected**

A & R Plan	N/A	Records & Reporting	U <sup>6,7,8,9</sup>	Final Report	N/A
Geotechnical Inspection	N/A	Posting, Signage	A	Contingency Plan	N/A
Restorations Activities	N/A	Spills	U <sup>1</sup>	O & M Plan	U <sup>5</sup>
Maintenance	U <sup>2,3,4</sup>	Modifications	N/A	Annual Report	A

### General Condition Comments:

Concerns:

1. Many remaining used oil containers and oil needs to be disposed of at proper recycling or burning facilities. Open containers of used oil need to be emptied/secured and the used oil needs to be transferred to proper containers and the empty containers disposed of. It appears that more soil is contaminated due to poor storage and disposal of used oil.

This issue was improved at the time of the September 17, 2010 Water Licence Inspection, in which a lot of the oil and containers were consolidated and emptied. The oil storage and disposal situation has become much more critical and there will be further problems and contamination unless the Hamlet dedicates the proper resources to clean up the site. Right now this is an environmental liability with tremendous risk of further uncontrolled leaks/spills, vandalism and even a fire hazard for the town given the open containers and large used oil tanks.

The remaining contaminated soil needs to be cleaned up, contained and properly disposed of. The Hamlet needs to ensure there is a proper procedure to maintain the organization and cleanliness of the waste oil storage area. When there has been spillage, make sure the soil and waste oil is cleaned up, contained and properly disposed of. Further, ensure that the hazardous waste storage area is regularly inspected, maintained and materials stored properly. This will ultimately keep the area clean and encourage the public to segregate waste properly. The Hamlet might want to consider collecting used oil at the Hamlet Public Works shop where there can be regular and proper supervision and care of the oil collection/storage.

2. Currently there are storage tanks on site for used oil storage. One particular tank that is being filled has its associated metal berm full of oil and what's estimated to be water. It is only a matter of time till it is overflowing. This actually provides no contingency containment if there ever was a leak since the berm is full.

At the very least until the tank is emptied and removed, the tank and berm need to be covered properly to prevent further water from getting in the berm and being contaminated. Currently there is a tarp that is not well secured and not providing adequate coverage. This needs to be improved on in the meantime while there is rain. Covering with corrugated metal has been used in other places.

The storage of oil in the larger tanks has created another problem and a plan is needed to empty it for proper disposal which would consist of shipping out for disposal or burning in local waste oil burners. The best and permanent solution would be for the used oil to be emptied from the berm and the tank while being transferred to more manageable totes or barrels. Storage of used oil in large metal storage tanks is only a short term solution and they eventually fill up and need to be emptied.

3. There was an area of ponded water (behind the domestic waste cell and the used oil storage area) with solid waste present in it that should be dealt with. The waste needs to be removed from the water and properly disposed of in the main domestic waste cell.

4. There continues to be waste disposed of in the wrong area. Further waste segregation signage is needed. There needs to be a sign in order to direct people where the building material, yard waste and white metal should go as there are no directions compared to other sites throughout the Fort McPherson Solid Waste Disposal Facility (SWDF).

Solid waste segregation needs to be continually maintained to further increase public guidance and assistance. For example if waste is disposed of in the wrong area it should be moved before other waste accumulates there as well. Further waste segregation signage is needed in the SWDF at each specific area. Segregation will aid in an organized site that residents will respect and help maintain. This will also keep costs down in the future for maintenance, when it is time to recycle waste or abandon and restore the site.

Signage should be present for but not limited to the following: bulk metal waste, white metal waste (fridges, washers/dryers, etc.), hazardous waste (oil, fuel, batteries, drums), empty drums, fuel tanks, tires, vehicles/ATVs/ skidoos, honey bag pit, waste animal pit, domestic/household garbage, paper/wood/cardboard- designated burning area, green waste – shrubs, trees, grass etc.

5. There are many additional cells and storage areas that are not on the current Operation and Maintenance Plan. It is apparent that the current O&M Plan (1997) needs to be updated and to include these new cells and storage areas. A revised Operation and Maintenance Plan (O&M Plan) for the Sewage and Solid Waste Disposal Facilities was required by March 1, 2008. To date a revised



## MUNICIPAL WATER USE INSPECTION REPORT

O&M Plan has not been received and is a violation of Part I: Conditions Applying to Operation and Maintenance, Item 1, of the Water Licence. Ensure the Hamlet Staff are aware of and follow the current O&M Plan to maintain consistency in how the Sewage Disposal Facility (SDF) and Solid Waste Disposal Facility (SWDF) are being operated.

6. An action plan to maintain freeboard at the Sewage Disposal Facilities was due May 30, 2008 and was not provided to the Gwich'in Land and Water Board (GLWB). This is a violation of the Water Licence Part B: General Conditions, Item 9.

7. Terms of reference for a bio-physical assessment of the environment receiving sewage effluent discharges were not provided by March 28, 2008 to the GLWB and is a violation of Part B: General Conditions, Item 10 of the Water Licence.

8. A plan outlining steps to improve sewage treatment efficiency (trucked sewage system) including measures to reduce Ammonia Nitrogen in the waste water effluent stream to meet applicable water quality guidelines was due October 30, 2009. Since the plan was not provided to the GLWB, this is a violation of the Water Licence Part B: General Conditions, Item 11.

9. Work has started to prepare the new SWDF site. Plans have been submitted for the new SWDF but have not been approved and the Hamlet is not able to move any infrastructure until authorized by the Gwich'in Land and Water Board. Additionally the new site for the SWDF needs to be approved by the Gwich'in Land and Water Board prior to use.

A proper Abandonment and Restoration Plan needs to be submitted for approval at least six months prior to abandoning any sewage or solid waste facilities as stated in the Water Licence Part G: Conditions Applying to Abandonment and Restoration, Item 1.

As per the Water Licence the Hamlet needs to comply with Part G: Conditions Applying to Abandonment and Restoration, Item 1, which states, "The Licensee shall submit to the Board for approval an Abandonment and Restoration Plan at least six (6) months prior to abandoning any sewage or solid waste facilities. The Plan shall include, but not be limited to:

- a) contaminated site remediation;
- b) leachate prevention;
- c) an implementation schedule;
- d) maps delineating all disturbed areas, borrow material locations, and site facilities;
- e) consideration of altered drainage patterns;
- f) type and source of cover materials;
- g) future area use;
- h) hazardous wastes;"

### Notes:

- 2012 Annual Report was provided.
- During the week of July 8, 2013 according to the Senior Administrative Officer- Susan Blake there would be engineers in the Hamlet assisting with the work for the Municipal Water Licence Renewal and the prepared site for the proposed new Solid Waste Disposal Facility. During this time the engineers will also be looking at the berm for the Sewage Disposal Facility (sewage lagoon).
- Segregation signage for waste metal, household waste, animal waste, oil/batteries present. Burning strictly prohibited sign present.
- A reminder that waste vehicles need to be emptied of their fluids as this is a source of contamination. During past inspections there was evidence that this hasn't occurred as there appeared to be vehicular fluids that had been spilled. Now there is controlled access to the SWDF this will be a requirement that needs to be ensured and maintained.
- It is noted that with other soil contamination cleanup projects in the area there might be ways to work together to share cleanup and remediation costs like those associated with the operation of a landfarm.

### NON-COMPLIANCE/VIOLATIONS OF ACT OR LICENCE

Part B: General Conditions, Item 9,

"The Licensee shall submit to the Board for approval, no later than May 30, 2008, an action plan outlining what steps will be taken to consistently maintain the specified freeboard at the trucked sewage disposal facilities..."

Part B: General Conditions, Item 10,

"The Licensee shall prepare, and submit to the Board and Fisheries and Oceans Canada for approval, no later than March 28, 2008, terms of reference for a bio-physical assessment of the environment receiving the sewage effluent discharges, namely Sewage Lake and the lake and wetlands downstream from the trucked sewage retention lagoon..."

Part B: General Conditions, Item 11,

"The Licensee shall submit to the Board for approval, no later than October 30, 2009, a detailed plan outlining what steps will be taken to improve sewage treatment efficiency (trucked sewage system). The plan shall include, but not be limited to, measures to reduce Ammonia Nitrogen in the waste water effluent stream to meet the applicable water quality guideline (CCME - Canadian Water Quality Guideline for the Protection of Aquatic Life)..."

Part D: Conditions Applying to Waste Disposal, Item 8.

"The Licensee shall maintain the Sewage Disposal Facilities to the satisfaction of an Inspector."

Part I: Conditions Applying to Operation an Maintenance, Item 1,

"The Licensee shall, within six(6) months of the issuance of this Licence, submit to the Board, with a copy to the Inspector, for approval, a revised plan for the Operation and Maintenance of the Sewage and Solid Waste Disposal Facilities..."

Inspector's Signature:

Date:	June 27, 2013	Licence #:	G03L3-001	Page No:	5
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## MUNICIPAL WATER USE INSPECTION REPORT

### Inspection Images:

**Figure 1**

Water Supply Facility - Deep Water Lake Intake Facility fuel storage is a concern. The piping is attached to the bottom of the fuel tank and is susceptible to any instability which could cause a spill.



**Figure 2**

The area for burning acceptable waste such as cardboard, paper and untreated wood waste lies within the drainage of the Solid Waste Disposal Facility. Any runoff will be contaminated with left over ash from burning.



**Figure 3**

The Solid Waste Disposal Facility waste oil storage area is at a critical stage where containers are unsecured, full and spilling over. The soil is very contaminated with used oil. This represents a huge liability for the Hamlet.



**Figure 4**

Waste oil storage area has open or unsecured containers with used oil leaking out. The oil needs to be consolidated into strong and secure containers to ensure proper storage of used oil until time for disposal or recycling.



**Figure 5**

Domestic waste is being disposed in an area other than to the designated waste cell. The surrounding area needs to be cleaned and barricades set up so there is no confusion and opportunities to put waste in the wrong place.



**Figure 6**

Ponded water in area behind the waste oil storage needs to be cleaned up and permanently prevented for people disposing of their waste there.

