

ENTERED APR 04 2011

Gwich'inat Eenjit
Gadat'igwijilcheii Gidilii
Gwich'in nae, nakhwik'you ts'at gwitr'it
tthak nakhwidavee gw'heesaa eenjit



Gwich'in Tribal Council
Gwich'in land, culture & economy for a better future

May 20, 2009.

Indian and Northern Affairs Canada
Northern Mackenzie District
P.O. Box 2100
Inuvik, NT
XOE0T0

Attn: Jan Davies

Water Resources Officer

Re: **Inspection with regards to the Gwich'in Wellness Camps Municipal Water License (G08L8-002)**

Dear Mr. Davies,

Thank you for your letter dated May 14, 2009, regarding your inspection of the Gwich'in Wellness Camp. We have reviewed your comments and concerns and have responded to each one to the best of our ability. As you are most likely aware, June 2008 to December 2008 constituted the first year of program operations for the Gwich'in Wellness Camp. It was fraught with the expected mechanical and program challenges from which we have learned a tremendous amount.

As your report points out there are violations as well as improvements to be made in terms of our licensing requirements and operations, to which we are committed to correcting. Our goal is to have a minimal ecological footprint, execute successful health and wellness programming as well as have this site be an ongoing and sustainable area for generations to come.

I have attached an Annual Report, a Waste Management Plan and Abandonment and Reclamation Plan for the Gwich'in Wellness Camp. Please let me know if these plans meet your standards and whether or not we should meet in order to clarify any details.

Sincerely,

Jennifer Johnston
Executive Director
867-777-7934
Gwich'in Wellness Camp
Gwich'in Tribal Council



May 20, 2009.

Comments on INAC reported Concerns, dated May 7, 2009.

Waste Disposal

Discharge quality is unknown as SNP samples are not being collected.

This is incorrect. To be more accurate, we have been inconsistent in preserving the lab reports. The Town of Inuvik's Environment Health was also contacted, but unfortunately copies of lab reports were also not preserved. The water samples have been taken bi-monthly and at times weekly from both effluent line and main building kitchen taps water. They are delivered within 12 hours (usually within one to two hours) to the lab at Inuvik Hospital. For a long time we were not receiving feedback, therefore called to get a verbal report. These always reported that the water quality (lab results) were acceptable. We were informed that when something is flagged at the hospital lab it is sent down to Edmonton for further analysis. To my knowledge this only happened once due to a documentation error where the Camp Maintainer was not clear on the form that the water sample in question was effluent versus drinking water. Later reports were faxed to us. In future we will also sample water in river (East Branch) in front of camp. There seems to be a discrepancy between various agencies with regards to how often samples should be taken. Request specific direction on that please.

Length of sewage effluent discharge hose is a concern.

This issue was discussed July 28, 2008, with INAC present where we understood that the length of hose was sufficient. If this is not case, it can be lengthened. The suggestion that the pooling water is effluent should be determined by a sample taken. Also, it should be considered, that during this time of year snow is melting as well as the physical environment where the camp exists could also be potential causes of pooling effects.

Overflow has occurred from primary tank during heavy loads. Pumps are reset so it doesn't overflow and prevent occurrences. Confirm the sewage treatment system is operating properly and whether maintenance is required.

Overflow occurs when the load from the main building is over the capacity of the system. This year was the first year the camp was in full operation therefore much is being learned through trial and error. The only way we have been able to anticipate an overflow, is when the camp is busy (showers, laundry,

kitchen, etc., are all being utilized). The Camp Maintainer is cognizant of this and therefore monitors the sewage plant closely to reset the pumps as required.

Used oil spilled from storage containers as a result of a recent oil change for the generators.

This specific spill in question has been cleaned up and put in a secure container until which time it can be brought to the Town of Inuvik.

Leaks and/or spillage of oil are occurring from the generators. Repair leaks if present on generators. Ensure there are adequate drip trays and spill pads to contain the spilled material and to maintain clean facilities.

Trays were present during the inspection and are always there to capture the residue from the normal operations of generators. The generators have no leaks on them, however, are maintained daily and serviced annually.

Abandonment and Restoration Plan.

Please see attached.

Waste Management Plan.

Please see attached.

Fuel Storage

Evidence of fuel staining on the gravel underneath the fuel storage tank. The affected area needs to be cleaned up and properly disposed of. Confirm that the piping and tank is secure. When re-fueling the tank ensure there is no spillage and the fuel storage tank is not overfilled.

When refueling at the camp occurs all those on site (Camp Maintainer, Contractor Personnel, etc.) are instructed to read the Gwich'in Wellness Camp Spill Contingency Plan prior to refueling. Spill pads and spill trays are always present during refueling. During winter months it is sometimes difficult to ascertain spills that are missed. Camp Maintainer will rectify this as well as wipe down Enviro-Tank.

Given the current volume of fuel storage and the proximity to the Mackenzie River it is recommended that a lined berm (tertiary containment) be installed to include the fuel storage tank and piping to prevent contamination of the downstream freshwater supply in the event of a fuel spill.

Was awaiting spring thaw to construct berm requirement and will begin executing this requirement.

Surveillance Network Program

Camp is required to be sampling as per the Surveillance Network Program to monitor discharge quality from the Sewage Disposal Facility.

Will keep copies of reports as well as submit to INAC, GLWB on a regular basis.

Ensure Annual Reports are submitted as per Water License Criteria Part B1.

Please see attached.

Response to Non-Compliance of Act or Licensee:

Part B1, 2008 Annual Report not submitted.

Please see attached.

Part B2, Licensee shall comply with the "Surveillance Network Program".

Will comply.

Part B5, Post signs to identify the stations of the "Surveillance Network Program".

Will comply.

Part B6, Post signs to inform the public of Water Supply and Waste Disposal Facilities.

Will comply

Part B9, Licensee shall by December 31, 2008, submit a Waste Management Plan.

Will comply.

Part G1, Licensee shall by February 27, 2009, submit an Abandonment and Restoration Plan.

Please see attached.

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Gwich'in Wellness Camp Annual 2008 Report

The Gwich'in Wellness Camp is located up the East Branch of the Mackenzie River, approximately 12 km from the Town of Inuvik. Last year was the first year of operations for the camp. The camp began running programs in June 2008 until September of 2008 and then again from December 2008 until April 2009.

Water Supply

During the above time frames, water was accessed from both the East Branch river situated in front of the camp as well as brought in by Bob's Welding when it was too cold to pump from river. The quantity of water used was 336 m^3. During the winter months approximately 3 truckloads (2 m³ each) of the Town of Inuvik's treated water were utilized. In April of 2009, Dowlands Contracting Ltd. cleaned out the Water Treatment Plant tanks, as is done annually.

Effluent Discharge

Effluent discharge amounts were equal to water usage.

Surveillance Network Program

We have been remiss in keeping the reports. This author contacted Environment Health, in Town of Inuvik to access their copies who stated they did also not keep copies of reports. The water samples have been taken bi-monthly and at times weekly from both effluent line and main building kitchen taps water. They are delivered within 12 hours (usually within one to two hours) to the lab at Inuvik Hospital. For a time we were not hearing back from hospital, so would call and get a verbal report that the water quality was fine. We were informed that when something is flagged at the hospital it is sent down to Edmonton for further analysis. To my knowledge this only happened once due to a documentation error where the Camp Maintainer was not clear on the form that the water sample in question was effluent versus drinking water. At that time the Camp Maintainer was phoned by those doing the analysis to ascertain source of water. Later reports were faxed to us. In future we will also sample water in river (East Branch) in front of camp, to determine whether camp operations are adversely affecting the river. There seems to be a discrepancy between various agencies with regards to how often samples should be taken. Request clear direction on that how often samples are to be taken and from which sources.



May 20, 2009.

Waste Management Plan for the Gwich'in Wellness Camp Site

Procedures and measures to deal with the Gwich'in Camps program generated waste are as follows.

Waste, debris, garbage and other non-hazardous materials will be removed from the camp on a bi-weekly basis. The camp will be kept clean and tidy on a daily basis through the regular collection and disposal of all garbage by the Camp Maintainer. Materials that can be recycled will be taken to the Town of Inuvik's Recycling Plant.

Sludge from the Sewage Treatment Plant will be removed at minimum, once a year, and transported to the Town of Inuvik by a Private Contractor located in the Town of Inuvik. Effluent generated from the Gwich'in Wellness Camp is treated within the sewage treatment plant and pumped out back. This will be tested bi-monthly, except during freeze-up and break-up due to inaccessibility. All records of lab results will be kept on site at the Gwich'in Camp.

Hazardous materials will be stored in containers that prohibit or reduce environmental hazards until such time materials can be safely transported to Inuvik's Waste Site Facility. Potential hazardous wastes generated from the Gwich'in Camp are: generator oil, hydraulic oil, glycol, diesel, gas, motor oil, antifreeze, and chemicals for water and sewer treatment plants (chlorine, sodium metabisulfite and hypochlorite solution).

Abandonment and Reclamation Plan for Gwich'in Wellness Camp Site

The purpose of the Gwich'in Wellness Camp was to be a regional health and wellness resource for time immemorial. However, if this is not the case the following will occur. An abandonment and reclamation process would return the site to its previous state. This would happen with the following: Buildings will be dismantled and removed careful not to disturb surrounding wildlife and vegetation. Fuel storage and propane tanks will be emptied and removed according to Environment Standards of the NWT. During this removal any spills will be cleaned up and contained immediately.

Any hazardous waste and/or materials will be properly handled, carefully and to code transported back to the appropriate hazardous waste sites. Any holes or disruption in the land structure would be backfilled, regraded and partially revegetated. These activities will be executed during the appropriate season and in the proper sequence.

When and if the site is ultimately abandoned, the productive capacity of the site will have been restored and the residents of the Beaufort Delta will have benefited from employment opportunities, and the wellness camps on the land programming.