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February 27, 2025

File: MV2011L3-0001

Tracy Thomas, SAO
Town of Fort Smith
P.O. Box 147
Fort Smith NT X0E 0P0

Sent by email

Dear Tracy Thomas,

**Re: Sludge Management Plan (appendix to Sewage Disposal Facilities Operation and Maintenance Plan Version 1.2) – Not Approved
Town of Fort Smith – Municipal Water Licence MV2011L3-0001**

The Mackenzie Valley Land and Water Board (Board) met on February 20, 2025 and considered the Sludge Management Plan (appendix to Sewage Disposal Facilities Operation and Maintenance Plan Version 1.2),¹ submitted by the Town of Fort Smith (Town) on October 17, 2024 as required by Water Licence (Licence) MV2011L3-0001 and the Board's direction in its July 25, 2022 Decision Letter.²

The Board notes that the Town's Sludge Management Plan exceeds the requirements for a sludge management plan as described in the LWB/GNWT *Guidelines for Municipal Sludge Management for Passive Sewage Treatment Systems in the NWT* (2022).³ As such, the Board has not approved the Sludge Management Plan (appendix to Sewage Disposal Facilities Operation and Maintenance Plan Version 1.2).

Instead of a revised Plan, the Board requires the Town to submit a letter, providing clarification and to address the Board's requirements, for Board staff confirmation of conformity by March 1, 2025, and to include the following information:

¹ See MVLWB Online Registry www.mvlwb.com for [Ft Smith - Sewage Disposal Facilities Operation and Maintenance Plan V1.2 - Sludge Management Plan - Oct17 24](#).

² See MVLWB Online Registry for [Ft Smith – Approval - Sewage Disposal Facilities Modification - Jul25 22](#).

³ See www.mvlwb.com for [LWB/GNWT Guidelines for Municipal Sludge Management for Passive Sewage Treatment Systems in the NWT \(2022\)](#).

1. The Town will follow the LWB/GNWT *Guidelines for Municipal Sludge Management for Passive Sewage Treatment Systems in the NWT (2022)* when managing sludge at the SDF; and
2. The Town is not currently planning to close the Solid Waste Disposal Facilities; as such, composted sewage sludge is planned for use as daily or intermediate cover, not final cover.

As outlined in the Board's July 25, 2022 letter to the Town, this letter must be submitted 60 days prior to removal of sludge from the Geotubes. No sludge is to be removed from the Geotubes until Board staff conformity of conformity has been confirmed in writing by Board staff.

Please direct questions or concerns regarding this letter to Kathy Racher via [email](#).

Yours sincerely,



Tanya MacIntosh
Chair, Mackenzie Valley Land and Water Board

BCC'd to: Town of Fort Smith ORS Distribution List
 Joshua Gauthier – Inspector, GNWT-ECC
 Wendy Bidwell – Inspector, GNWT-ECC