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March 3, 2024

File: MV2023L1-0009

Katie Oliver,
KBL Environmental Ltd.
3909, 68 Avenue
Leduc, AB, T9E 0Z4

Sent by e-mail

Re: Yellowknife Soil Treatment Facility – Water Licence –Renewal Application – Information Requests

On November 23, 2023, Mackenzie Valley Land and Water (Board) staff received the renewal Application Package (Application) for Water Licence (Licence) MV2023L1-0009¹ for the Yellowknife Soil Treatment Facility (Project) from KBL Environmental Ltd. (KBL).

Board staff have determined that additional evidence is required to establish Effluent Quality Criteria requirements for the Licence. These additional requirements are set out as numbered Information Requests (IRs).² The Board requests that KBL submit the information by **March 20, 2024, 5pm Mountain Time.**

Background

KBL proposed new EQC during the [application review](#).³ Later, during the [review of the draft licence](#), KBL provided additional information.⁴ This resulted in uncertainties, which are described below.

- KBL indicated the proposed EQC are based on the Federal Interim Groundwater Quality Guidelines (FIGQG) Freshwater Coarse Criteria. However, it is not clear what specific Freshwater Coarse Criteria are applicable.

¹ See the MVLWB Online Registry [www.mvlwb.com] for [MV2023L1-0009](#)

² In accordance with the Land and Water Board [Rules of Procedure](#) Rules 61 and 63

³ In response to Board staff comment 15, which was submitted as an attachment

⁴ In response to GNWT-ECC comment 5

- Some of the proposed EQC do not match the referenced criteria. For example:
 - Silver and thallium do not match Tier 2, Freshwater Coarse Soil.
 - Boron appears to be taken from Marine.
 - Copper and ethylbenzene appear to be taken from Livestock.

- Some criteria must be calculated based on pH and hardness, though, supporting calculations have not been provided.

- Some hydrocarbons that have EQC in the current licence (MV2019L1-0003) were not included, though, supporting rationale was not provided as to why EQC are not required for these.

Information Requests to KBL

IR#	Information Request
1.	List each proposed EQC and source where they were derived and/or calculated from, including a link to supporting documents.
2.	Provide supporting evidence for any criteria derived from sources other than Freshwater Life, Coarse.
3.	Provide proposed EQC for parameters that were included in the current licence (MV2019L1-0003) but not yet proposed for as part of the new licence (MV2023L1-0009). OR Provide supporting rationale for why they are not included.

Please contact Andrew Wheeler via [email](#) or at (867) 766-7467 with any questions or concerns regarding this letter.

Yours sincerely,



Andrew Wheeler
Regulatory Specialist

BCC'd to: Akaitcho Distribution List