

From: Sabrina Sturman
To: "Nick.Lawson@stantec.com"; "sjoerd.wielen@gov.deline.ca"
Cc: [Paul Dixon](#)
Subject: S12L3-006 - Deline WL expiry Dec 4, 2017 - renewal requirements
Date: October 30, 2017 4:53:00 PM
Attachments: [image001.png](#)
[S12L3-006 - Summary Table - outstanding items - Oct 30 17.pdf](#)

Good day Nick and Sjoerd,

I am writing to follow up the notification we received on Oct 27 indicating that Deline Got'ine Government has retained Stantec to assist with preparation of the application for renewal of the municipal water licence S12L3-006 that expires on Dec 4, 2017.

I have followed up with Mr. Lawson, indicating that I will be the point of contact for the Board during this regulatory process. Below is an outline of the requirements for the renewal application and I have also attached a table which captures ongoing compliance concerns. We also anticipate there has been some resolution with regard to responsibility for the closure and reclamation of the solid waste facility with MACA; which we were made aware of in July 2017.

Application requirements are outlined in the [Guide to Completing Water Licence Applications](#) and summarized below with hyperlinks to applicable guidance documents:

- Complete Application forms – [Water Licence](#) – with appropriate fees (\$30) payable to Receiver General of Canada
- Engagement Record and Engagement Plan – See our [Engagement and Consultation Policy](#) and [Engagement Guidelines for Applicants and Holders of Water Licences and Land Use Permits](#) – for municipal licences we generally anticipate evidence of a written notification of the initiation of the renewal process that has been circulated to the community
- [Waste Management Plan](#) – see our Templates for Municipal Water Licences: [Wastewater \(sewage\) Treatment System](#) & [Water Treatment Plant](#) & [Solid Waste Facility](#)
- [Spill Contingency Plan](#) – see our Templates for Municipal Water Licences: [Spill Contingency Plan](#)

Please also note the [Document Submission Standards](#) and [Guideline for Geographic Information Systems \(GIS\) Submission](#).

Should you have any questions or concerns, please don't hesitate to contact me.

Respectfully,

Sabrina Sturman
Regulatory Specialist,
Sahtu Land & Water Board

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[S12L3-006](#) – Charter Community of Deline – Overdue and Pending Water Licence Submissions – Oct 30, 2017

Licence Condition	Report Title/Action Required	Submission due date	Proposed submission date	Comments
B.1	Annual Report –2012, 2013, 2014, and 2015 reports were submitted April 2, 2016 - immediate submission to the Board required for 2016.	Mar 31, every year – Outstanding – response to reviewer comments on 2012 to 2015 ARs & submission of 2016 AR.		Board staff visited Deline to provide assistance with preparing outstanding submissions for 2012, 2013, 2014 and 2015 on Mar 31, 2016 – all AR received by Board April 2, 2016 – posted to Online Review System (ORS) on April 22, 2016 with review comments due May 27, 2016 and Proponent responses due June 10, 2016. Review comments were received by GWNT-ENR (ID 1-3) however Proponent responses were not received at the time this table was prepared.
B.2	SNP – incomplete implementation of required sampling - annual decant results reported in 2012, 2014 and 2015 AR	Initial round of 2016 SNP sampling was anticipated during spring thaw.		<p>Please confirm with Board staff when sampling at SNP Stations 0555-3 to 0555-7 has been initiated. Board staff prepared a SNP Manual for S12L3-006 (July 27, 2015)</p> <p><u>Proposed update to WL during renewal</u> (based on ENR requested follow up on Jun 7, 2016 and recent municipal issuances in Mackenzie Valley):</p> <p>Part D, item 6: The Licensee shall advise an Inspector and the Sahtu Land and Water Board at least ten days prior to initiating decant</p> <p>Changed to:</p> <p>The Licensee shall provide analytical results from SNP station 0555-1 to an Inspector and the Board no later than five (5) days prior to initiating the Discharge (decant) of effluent from the sewage lagoon to the Receiving Environment. Discharge shall not commence until authorized in writing by an Inspector.</p> <p>SNP, Part B, item 1: Effluent at Station Number 0555-1 shall be sampled at the beginning, and every three days thereafter</p>

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				<p>during periods of decant, and shall not exceed the following criteria:</p> <table> <thead> <tr> <th><u>Parameter</u></th> <th><u>Max. Concentration</u></th> </tr> </thead> <tbody> <tr> <td>Faecal Coliform</td> <td>10,000FC/100ml</td> </tr> <tr> <td>BOD₅</td> <td>80 mg/L</td> </tr> <tr> <td>Total Suspended Solids</td> <td>100 mg/L</td> </tr> </tbody> </table> <p>Changed to</p> <p>Effluent at Station 0555-1 shall be sampled a minimum of 15 days prior to planned start of Discharge (decant) and weekly thereafter during periods of decant and shall not exceed the following criteria:</p> <table> <thead> <tr> <th><u>Parameter</u></th> <th><u>Max. Concentration</u></th> </tr> </thead> <tbody> <tr> <td>Faecal Coliform</td> <td>10,000FC/100ml</td> </tr> <tr> <td>BOD₅</td> <td>80 mg/L</td> </tr> <tr> <td>Total Suspended Solids</td> <td>100 mg/L</td> </tr> </tbody> </table> <p>ENR Inspection Report from September 20, 2017 indicates follow up inspection anticipated (Oct 2017) to facilitate selection of appropriate SNP Station locations.</p>	<u>Parameter</u>	<u>Max. Concentration</u>	Faecal Coliform	10,000FC/100ml	BOD ₅	80 mg/L	Total Suspended Solids	100 mg/L	<u>Parameter</u>	<u>Max. Concentration</u>	Faecal Coliform	10,000FC/100ml	BOD ₅	80 mg/L	Total Suspended Solids	100 mg/L
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B.8	SNP – Map of sampling locations with associated GPS coordinates – for Board approval			Outstanding – Board requires immediate follow up.																
D.4	Board approval required prior to discharge of sludge from the sewage lagoons	July 31, 2015		Outstanding – The Board approved Closure and Reclamation Plan (CRP, Version 2.0) includes plans for the decommissioning of the sewage lagoon which is at the end of its lifespan. The March 9, 2015 CRP approval letter required the submission of an Implementation Schedule outlining the work plan and timeline to implementing the remediation process which was due July 31, 2015 . If the planned treatment technique detailed in the CRP V2.0 is not implemented then Part E applies as the method will be considered a modification.																

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				ENR Inspection Report from September 20, 2017 indicates that new facility is in use – follow up inspection anticipated (Oct 2017) to facilitate selection of appropriate SNP Station locations.
D.6	Notification to SLWB and Inspector at least 10 days prior to initiating decant of the sewage lagoon			<p>Received June 6, 2016 – anticipated start June 16, 2016. Inspector request results received prior to start of decant.</p> <p><u>Proposed Board initiated amendments to S12L3-006 above under B.2</u></p> <p>ENR Inspection Report from September 20, 2017 indicates that new facility is in use – follow up inspection anticipated (Oct 2017) to facilitate selection of appropriate SNP Station locations.</p>
D.12	The Licensee shall maintain the Solid Waste Disposal Facilities to the satisfaction of the Inspector.			<p>The Sept 1, 2015 Inspection Report documents use of a temporary landfill cell that was constructed in the current use landfill that was in poor condition and required cleanup by Oct 31, 2015, with the understanding that the new facility was scheduled for use in late Sept 2015.</p> <p>The 2015 AR received April 2, 2016 suggests this area will be addressed in 2016 with the final cleanup of the landfill site. The Board has not received timeline of closure and reclamation activities as required by July 31, 2015 and detailed under D.4 nor does it know when the new facilities will be commissioned although transfer of some materials began in 2015 (see 2015 AR, Part 8 and Board staff email correspondence regarding authorization of bulk metal transfer – Oct 2_15).</p> <p>November 4, 2016 – received Notification of Construction of new solid waste site (garbage dump) which anticipated 4 weeks of construction. Anticipated activities related to address</p>

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				<p>current use site status with submission of construction plans – outstanding.</p> <p>ENR Inspection Report from September 20, 2017 reiterates concern from Sept 2015 related to current use facility (old landfill), indicating that new facility is not in use but anticipated in spring/summer 2018. Inspector has not given timeline related to required cleanup at the current use landfill however recommends improved care and maintenance of the site in the interim.</p> <p>Outstanding - An updated O&M Plan and as-built drawings are required for the new facilities.</p>
D.15	The Licensee shall develop a hazardous waste management plan as a component of the Operation and Maintenance Plan for the SWDF.	March 31, 2016		<p>Outstanding - Direction in the Sept 1, 2015 Inspection Report required the O&M Plan be submitted to the Board immediately with outstanding ARs. Board staff had notified Licensee of available O&M Plan templates Oct 2015.</p> <p>Board staff have been advised that Stantec has been retained to assist with preparation of all outstanding requirements (April 2016).</p>
E.3	The Licensee shall provide to the Board as-built plans and drawings of modifications within ninety days of completion.			<p>Outstanding - The Sept 1, 2015 Inspection Report documented temporary landfill construction as a violation of this part of S12L3-002 and required that as-built plans be submitted to the Board immediately however have not been received.</p>
F.1	The Licensee shall review the Spill Contingency Plan annually and revise the plan as necessary to reflect changes in operations and technology.			<p>Outstanding - The Board has not received an updated SCP since S12L3-006 was issued and requires immediate follow-up. The Licensee has been notified of available template.</p>
G.2	The Licensee shall implement the Plan (Closure and Reclamation Plan) as and when approved by the Board.	July 31, 2015		<p>Outstanding – The Board approved the Closure and Reclamation Plan (CRP, Version 2.0) on March 9, 2015 however required the submission of an Implementation Schedule outlining the work plan and timeline to implementing the remediation process which was due July 31, 2015.</p>

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				Board staff have been advised that Stantec has been retained to assist with preparation of all outstanding requirements (April 2016 & Oct 27, 2017 to prepare renewal application).
G.3	Upon implementation of the Closure and Reclamation Plan, the Licensee shall provide to the Board updates of all closure and reclamation activities by March 31 st of each year.			<p>Outstanding - The 2015 AR received April 2, 2016 includes minimal details of scope of activities complete in 2015 – limited to bulk metal transfer to new facility and construction of temporary waste cell. The Board has not received timeline of closure and reclamation activities as required by July 31, 2015 and detailed under D.4 and G.2.</p> <p>July 2017 – correspondence with Board regarding potential submission of two Licence applications, one led by MACA to complete the CRP activities and other for standard municipal operations – renewal.</p>
H.2	The Licensee shall submit to the Board rationale and design drawings prior to construction of any dams, dykes, or structures intended to contain, withhold, divert, or retain water or wastes other than as contemplated in the Spill Contingency Plan.			<p>April 1, 2016: Board received notice of construction of temporary berm to retain waste associated with acceptance of cleanup materials from operator outside municipal boundaries from winter road spill that was developed in collaboration with ENR (Lands) and Bassett Petroleum. Map of location outstanding.</p> <p>June 26, 2016: Board received notice of construction of fence at new SWDF and wood disposal area adjacent to the facility to commence June 30, 2016 with completion anticipated within 7 days on June 27, 2016. As-built drawings outstanding.</p> <p>November 4, 2016 – received Notification of Construction of new solid waste site (garbage dump) which anticipated 4 weeks of construction. Anticipated submission of construction plans – outstanding.</p>
I.1	The Licensee shall submit to the Board for approval revised Operation and Maintenance Plans	Prior to use of new facilities		Outstanding - Deline committed to submitting updated O&M Plans to the Board for approval prior to the new facilities accepting waste. Board staff have reminded the Licensee of

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				<p>responses to reviewer comments and note that the new SWDF begun accepting waste for safe work purposes in 2015 however the O&M has not been received (see Request to Transfer Bulky Waste received September 30, 2015 and authorization letter correspondence dated October 2, 2015)</p> <p>The Board received the O&M Plan for the new sewage lagoon on Nov 18, 2013 however the plan has not been circulated for public review thus has not been approved by the Board.</p> <p>ENR Inspection Report from September 20, 2017 identifies that new facilities are currently in use. O&M Plan not yet Board approved</p> <p>The Licensee has been notified of available templates and advised the Board that Stantec has been retained to assist with preparation of all outstanding requirements.</p>