



**Aboriginal Affairs and
Northern Development Canada**

www.inac.gc.ca

North Mackenzie District
P.O. Box 2100
Inuvik, NT X0E 0T0

**Affaires autochtones et
Développement du Nord Canada**

www.aadnc.gc.ca

Telephone: (867) 777-8901
Fax: (867) 777-2090

File S12L3-006

June 28, 2013

Tony Morris
Regulatory Specialist
SAHTU Land & Water Board
P.O. Box 1
Fort Good Hope, NT X0E 0H0

Fax: 867-598-2325

Re: Deline Water Licence Amendment Application S12L3-006 – New Sewage Lagoon

Aboriginal Affairs and Northern Development Canada – Water Resources Division and North Mackenzie District (AANDC) has reviewed the Deline Municipal Water Licence Amendment Application for the new Sewage Lagoon. AANDC provides the attached comments in the Comment Table format.

Thank you for providing AANDC with the opportunity to comment on the above application. If you have any questions or concerns, please feel free to contact Jeanne Arsenault at 867-669-2658 or Jeanne.Arsenault@aadnc.gc.ca, or Jan Davies at 867-777-8909 or Jan.Davies@aadnc-aadnc.gc.ca.

Regards,

Jan Davies
Water Resource Officer
North Mackenzie District
Aboriginal Affairs and Northern Development Canada

Enclosure: Comment Table on Deline WL Amendment Application – New Sewage Lagoon

GENERAL INSTRUCTIONS FOR EXCEL TEMPLATE:

1. Do not leave blank rows above or between comments.
2. Do not modify the instructions or the column headings (i.e. the top three rows).
- 3. Each comment must have an associated recommendation.**
4. All formatting will be lost when this file is uploaded to the Online Comment Table.
5. If necessary, adjust the cell width and height in order to view all text.
6. Cutting and pasting comments from WORD documents cannot include hard returns (spaces between paragraphs).
7. If you would like to create paragraphs within a single cell, please use a proper carriage return (ALT & ENTER).

App #: S12L3-006

Review of: Charter Community of Deline, Water Licence Amendment

Reviewing Agency: Aboriginal Affairs and Northern Development Canada

Date: June 28th, 2013

<u>TOPIC</u> <i>Be as specific as you think is appropriate; for example a section or page of the document, a recommendation #, general comment, etc.</i>	<u>COMMENT</u> <i>Comments should contain all the information needed for the proponent and the Board to understand the rationale for the accompanying recommendation.</i>	<u>RECOMMENDATION</u> <i>Recommendations can be for the proponent or for the Board. Recommendations should be as specific as possible, relating the issues raised in the "comment" column to an action that you believe is necessary.</i>
Water Licence Amendment Old facilities/New facilities operations	<p>The current amendment application was submitted to the Board with respect to the new Sewage Disposal Facility (SDF), as that information was not available last November during Deline's water licence renewal.</p> <p>A SDF Operation and Maintenance (O&M) Plan for the new planned facility was submitted by Stantec as part of this amendment application, on behalf of the community.</p> <p>It was suggested by AANDC and agreed by the community this past November that O&M plans for the old SDF and Solid Waste Disposal Facility (SWDF) should be submitted by September 2013.</p> <p>AANDC understands that there are delays in finalizing plans for the old facilities and that GNWT and the community are working together to move things forward. With this in mind, the Board may wish to specify an appropriate date for the submission of O&M and Closure plans for the old SDF and SWDF.</p>	AANDC recommends that an appropriate date for the submission of O&M and Closure plans for the old SDF and SWDF should be determined.

<p>Water Licence Amendment Sewage Lagoon Relocation Drawings</p>	<p>Referring to the Sewage Lagoon Relocation Drawings page 7 of 9 there is a schematic titled Corrugated Metal Pipe Spillway Detail. While the metal pipe and rip rap will be necessary to prevent erosion from occurring there will still be some form of erosion as a result of the material that is around the rip rap. While on Municipal Water Licence Inspections in the field it has been noted that the erosion can still occur even when there is rip rap present. The erosion is drastically reduced when the chute is extended over the lagoon and doesn't discharge on the land surface. The sewage lagoon is expected to have a life expectancy of 20 years based on the submitted application and over time the rip rap and surrounding fill/ground surface will be affected.</p>	<p>It is recommended that the Metal Pipe Spillway as illustrated in the drawing should have the metal pipe be extended over the lagoon to avoid erosion altogether. This way the sewage effluent will empty directly over the lagoon's water surface and doesn't flow through rip rap and the ground causing erosion over time.</p>
<p>Spill Contingency Plan Date for revised SCP submission</p>	<p>In their response to AANDC last November, the community specified that a revised SCP containing updated contact information and most probable response scenarios would be provided by June 2013.</p> <p>Considering the delays mentioned above, the Board should specify a date for submission of the revised SCP.</p>	<p>AANDC recommends that a date for submission of the updated SCP be determine in order to reduce potential risks to the environment in the event of a spill.</p>
<p>Water Licence Renewal Operation and Maintenance Plan - Monitoring and Maintenance Checklist - p. 19</p>	<p>In the Sewage Lagoon Operation and Maintenance Manual there is mention of an daily checks and yet this is not incorporated into the Monitoring and Maintenance Checklist which appears in Appendix D. The filling out of a daily inspection checklist while useful might be onerous for such a simple activity which would occur on a very frequent basis. The value of daily observations is important and any issues or concerns should be included in some way in the currently proposed Site Inspection Template.</p>	<p>It is recommended that the Monitoring and Maintenance Checklist should be modified to include a special section where any issues or concerns from daily checks can be recorded for future reference when conducting weekly, monthly or annual checks.</p>
<p>Water Licence Renewal Operation and Maintenance Plan - Monitoring and Maintenance Checklist - p. 55</p>	<p>The current Sewage Lagoon Operation and Maintenance Manual indicates the items that are to be inspected on a weekly, monthly and yearly basis in an easy to use checklist.</p> <p>To further support the community with data & paper management, AANDC further recommends that checklist be slightly modified where each page would contain inspection results for 1 month. As such, 4 columns (one for each week of the month) could be added beside each inspection item to indicate inspection (yes/no). Spaces could also be added above each of these columns to write in the date of each weekly inspection. The same format could be used, on that same page, for monthly inspections (only one column would be required). Space at the bottom should remain to describe any inspected concerns. Finally, a word version of this page could be provided to the community in order to allow them to add any other item which may require close watch in the future.</p> <p>These tracking checklist could be easily stored in a binder and available as/when needed.</p>	<p>AANDC commends the community of Deline for providing a Monitoring and Maintenance Checklist in Appendix D. AANDC provides the recommendations to improve the checklist and make them easily accessible for monitoring and tracking purposes.</p>

<p>Water Licence Renewal Operation and Maintenance Plan - Sampling Instructions</p>	<p>After reviewing the Operation and Maintenance Plan "Quality Assurance (QA) and Quality Control (QC) Guidelines For Use by Class "A" Licences in Meeting SNP Requirements and for Submission of A QA/QC Plan" there was minimal instructions on how to conduct sampling. While the guidelines provide valuable information there is still need for sampling instructions. Often the laboratories that conduct the analysis of communities water and wastewater samples have sampling instructions available. These would be a very important component to have included in the Operation and Maintenance Plan and would aid in the Plan's use as a reference document.</p>	<p>It is recommended that the Operation and Maintenance Plan include sampling instructions from the laboratory that conducts their analysis as an appendix in the Operation and Maintenance Plan.</p>
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