



Legal Entity
Address

October 27, 2020
File: S15L3-002

Attention: Aswathy Mary Varghese, PhD
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Sahtu Land and Water Board
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Reference: Application for Renewal of Municipal Water Licence K'asho Got'ine S15L3-002

Please accept the Charter Community of K'asho Got'ine (Fort Good Hope)'s application to renew municipal type B water licence S15L3-002, which expires on December 15, 2020. In applying for the renewal, K'asho Got'ine has responded to compliance concerns raised in Inspection reports of May 2018 and July 2020. To assist with the review of the noted items, K'asho Got'ine retained Stantec Architecture Ltd., who conducted a facilities review in June 2020. As an outcome of the review, we are proposing several modifications to facilities and amendments to certain terms and conditions of the licence. We have itemized the response to compliance concerns and proposed amendments in the sections below.

ITEMS REQUIRING IMMEDIATE SUBMISSION TO THE BOARD:

Items requiring submission (per compliance letter May, 2018)	Action
Waste Disposal Facilities Fencing Action Plan (Part D, 16)	Included as Appendix A of Waste Facilities Report attached to this water licence (WL) application
Waste Disposal Facilities Flow Pathway Study (Part D, 18)	See notations below
Commercial and Industrial Operators Waste Management Plan (Part D, 20)	See notations below
Revised O&M Plans for Waste Disposal Facilities, Sewage Disposal Facilities & Water Treatment Plant (Part E, conditions 2-4)	Included as attachments to WL application
Waste Disposal Facilities Report (Part E, 5)	Included as attachment to WL application
Revised Spill Contingency Plan (Part H, 3)	Included as attachment to WL application
Interim Closure and Reclamation Plan (Part I, 1).	Included as attachment to WL application
Hazardous Waste Manifest and Maintenance Action Plan	Included as attachment to WL application
As-built drawings for the: <ul style="list-style-type: none"> • Water Treatment and Distribution Facilities and • Temporary Hazardous Waste Containment Facility 	Not available

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RESPONSE TO COMPLIANCE CONCERNS (MAY 2018, JULY 2020)

Compliance items are itemized below, and in some cases paraphrased for brevity. K'asho Got'ine's response is provided in the subsequent bullet(s).

Part B, Item 4, Annual Water Licence Reports:

- The 2018 Water Licence Annual Report (WLAR) is included with the water licence (WL) application
- The 2019 WLAR is included with the WL application

Part B, Item 6: Surveillance Network Program (SNP):

- The SNP sampling program was reviewed by Stantec during a site visit in June 2020. SNP sampling continues to have limited success. SNP sampling is impeded by lack of water in surface sampling locations and some confusion around ordering sampling equipment. Bottle order and sampling procedures were reviewed with site personnel.
- Groundwater wells were installed around the Solid Waste Disposal Facility (SWDF) by GNWT-MACA in 2018. K'asho Got'ine was provided access to the wells. Stantec inspected all groundwater wells in June 2020.
K'asho Got'ine is unable to make recommendations for modifications to the SNP based on the results of groundwater monitoring at this time. FGH suggests that a full five years of groundwater data are collected before such recommendations can be made. K'asho Got'ine will report on results of groundwater monitoring in annual reports.
- The Flow Pathway Study referenced in this section, and Part D, Item 18 would likely rely on the information obtained from groundwater flow and quality sampling of these wells. K'asho Got'ine proposes to continue to monitor presence, flows and quality of water in installed wells for a period of five years to inform the reasonably feasible objectives and scope of a groundwater study. K'asho Got'ine requests a change to the water licence condition to reflect the reasonable scope of reporting of groundwater presence and characteristics based on the availability of data.

Part B, Item 11: Signs

- Signage is currently present to identify the Water Treatment Plant, Reservoir, SWDF ("Town Dump") and certain areas within the SWDF. Additional signage has been ordered for areas within the SWDF consistent with the Waste Facilities Report, and will arrive on the winter road for installation in spring 2021.

Inspection report May 31, 2018 - waste streams are not being segregated properly

- Additional signage has been ordered for areas within the SWDF consistent with the Waste Facilities Report, and will arrive on the winter road for installation in spring 2021
- The Waste Facilities Report makes recommendations for re-configuration of the SWDF

Part D, item 3: Measurement of the Freeboard of the Sewage Disposal Facilities (Exfiltration trench)

- K'asho Got'ine commits to installing a permanent graduated scale within the sewage disposal trench, as described in section 3.2.4 of the Waste Facilities Report.

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Part D, item 10: fencing at the Sewage Disposal Facilities to limit access and prevent wind-blown debris

- See section 4.1.7 and Appendix A of the Waste Facilities Report for a description of, and proposed design of fencing around the sewage disposal trench. If the proposed design is approved, K'asho Got'ine will proceed with detailed design and procurement in winter 2021, with installation in spring 2021.

Part D, Item 11: The Sewage Disposal Facilities: Inspection Report May 31, 2018 noted: the pipe that is used for trucks to drain sewage into the Exfiltration Trench is not structurally sound; erosion and land slumping around the Exfiltration Trench appears to be caused by trucks discharging sewage outside of this discharge point; drain pipe needs to be repaired; fencing needs to be replaced.

- Section 3.2.3 of the Waste Facilities Report provides a typical detail of two proposed new truck dumping stations to be installed (one at each trench). If the proposed design is approved, K'asho Got'ine will proceed with detailed design and procurement in winter 2021, with installation in spring 2021.

Part D, Item 16: Waste Disposal Facilities Fencing Action Plan for capturing windswept Waste, deterring wildlife, and preventing unauthorized persons from entering the site.

- see section 4.1.7 and Appendix A of the Waste Facilities Report for a description of, and proposed design of fencing around the SWDF. If the proposed design is approved, K'asho Got'ine will proceed with detailed design and procurement in winter 2021, with installation in spring 2021.

Part D, Item 17: Within one (1) year following issuance, the Licensee shall install the fencing referred in Part D, item 16, to the satisfaction of an Inspector; site Inspection May 31, 2018 the fencing plan should be completed and submitted to the Sahtu Land and Water Board by August 2018.

- If the proposed fencing design is approved, K'asho Got'ine will proceed with detailed design and procurement in winter 2021, with installation in spring 2021.

Part D, Item 22: collection of windblown debris and other litter in the Waste Disposal Facility and surrounding lands, spring and fall of every year for the duration of the Water Licence.

- noted

Part D, item 18: Within one (1) year of issuance, the Licensee shall submit to the Board, for approval, a Waste Disposal Facilities Flow Pathway Study. The Study shall include, but not be limited to, the information as set out in Schedule 2, item 1 of this Licence.

- K'asho Got'ine proposes to continue to monitor presence, flows and quality of water in installed wells for a period of five years to inform the reasonably feasible objectives and scope of a groundwater study. K'asho Got'ine requests a change to the water licence condition to reflect the reasonable scope of reporting of groundwater presence and characteristics based on the availability of data.
- Results of groundwater monitoring will be used to reconsider SNP locations for groundwater and surface water.

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Part D, Item 20: Commercial and Industrial Operators Waste Management Plan. Monitoring and regulating the volume of Sewage and solid Waste deposited to the Waste Disposal Facilities from commercial and industrial operators working outside the municipal boundaries of Fort Good Hope. This Plan must be approved prior to the commencement of any agreements to receive Waste from commercial or industrial operators operating outside the municipal boundaries of Fort Good Hope.

- K'asho Got'ine currently does not accept wastes from commercial operators or businesses other than those operating within, or contracted to, K'asho Got'ine. A Commercial and Industrial Operators Waste Management Plan is not being submitted at this time.

May 31, 2018 Inspection Report large amount of hazardous wastes that appeared to be generated by local contractors. It is the responsibility of the Charter Community of K'asho Got'ine to communicate with local contractors that it is the contractors' responsibility to ensure their own hazardous wastes are shipped to an approved facility.

- Noted

Part D, Item 21: The Waste Disposal Facilities. Inspection report May 31, 2018 noted that the Solid Waste Facility is overall in very poor condition.

- Section 3.5 of the Waste Facilities Report includes recommendations for improvements to the operations and maintenance of the SWDF, including:
 - Re-organization and compaction of wastes
 - Regular compaction and cover
 - Crushing of bulky wastes
 - Fencing
 - Additional signage

K'asho Got'ine proposes to implement these recommendations beginning in winter 2021.

Part E, Item 2: submit a revised Operations and Maintenance Plan for the Solid Waste Disposal Facilities per Operations and Maintenance Plan Template - Solid Waste Facility.

- Please see attachment to water licence application

Part E, Item 3: submit a revised Operations and Maintenance Plan for the Sewage Disposal Facilities per Operations and Maintenance Plan Template – Wastewater (Sewage) Treatment System (WWTS)

- Please see attachment to water licence application

Part E, Item 4: submit a revised Operations and Maintenance Plan for the Water Treatment Plant per Operations and Maintenance Plan Template - Water Treatment Plant.

- Please see attachment to water licence application

Part E, Item 5: Waste Disposal Facilities Report. The Report shall determine the functional capacity and projected lifespan of the current Waste Disposal Facilities and shall contain an action plan for the establishment of new Facilities that includes timelines for planning, design and construction and identifies

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the triggers (e.g. time deadlines, capacity, Freeboard height) that will prompt the planning and construction of new Facilities.

- Section 3.5 of the Waste Facilities Report includes recommendations for improvements to the operations and maintenance of the SWDF, including optimization of available capacity. K'asho Got'ine will initiate these recommended actions beginning in winter 2021. The outcomes of these improvements, particularly optimization of the SWDF, will be used to evaluate the remaining capacity at the facility. K'asho Got'ine is not currently planning for a new SWDF or Sewage Disposal Facility.

Part F, Item 1: as-built drawings of the Water Treatment and Distribution Facilities and as-built drawings of the Temporary Hazardous Waste Storage Facilities.

- These drawings were not prepared at time of construction. Due to the current use of these facilities, it would not be possible to prepare as-built drawings.

Part H, Item 3: submit a Spill Contingency Plan per the Spill Contingency Plan Template.

- Please see attachment to water licence application

Part I, Item 1: Within one (1) year of issuance, the Licensee shall submit to the Board, for approval, an Interim Closure and Reclamation Plan. The Plan shall be in accordance with Schedule 3, item 1.

- Please see attachment to water licence application

DOCUMENTS FILED TO SUPPORT WATER LICENCE RENEWAL APPLICATION

The following documents are included with this water licence renewal application:

- Municipal Questionnaire
- O&M Plan – Water Treatment Plant
- O&M Plan - Solid Waste Facility
- O&M Plan - Sewage Facility
- Spill Contingency Plan
- Hazardous Waste Action Plan
- Interim Closure and Reclamation Plan
- Waste Facilities Report
- 2018 Water Licence Annual Report
- 2019 Water Licence Annual Report

We look forward to participating fully in the Sahtu Land and Water Board's review of the application.

Regards,

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Attachments:

c. E. Bonhomme, Stantec