

Review Comment Table

Board:	WLWB
Review Item:	Community Government of Behchoko - Hazardous Waste Management Plan and Spill Contingency Plan - Version 2.0 (W2014L3-0002)
File(s):	W2014L3-0002
Proponent:	Community Government of Behchoko
Document(s):	Hazardous Waste Management Plan Version 2.0 (4643 KB) Spill Contingency Plan - Version 2.0 (3.09 MB)
Item For Review Distributed On:	Nov 25 at 15:26 Distribution List
Reviewer Comments Due By:	Feb 11, 2021
Proponent Responses Due By:	Feb 25, 2021
Item Description:	<p>The Community Government of Behchoko (the CGB) submitted Version 2.0 of its Hazardous Waste Management Plan (HWMP) and Version 2.0 of its Spill Contingency Plan (SCP) on November 9, 2020. These plans were requested by the Board on October 27, 2014 during the issuance of W2014L3-0002. In Appendix A of the Reasons for Decision, the Board required the CGB to make the following revisions to the following plans:</p> <p>Hazardous Waste Management Plan (HWMP)</p> <ol style="list-style-type: none"> 1. Secondary containment is needed for the hazardous materials depot; and 2. The HWMP states that vehicles are buried once fluids are collected. Vehicles contain numerous pollutants in addition to fluids, such as: lead acid batteries, mercury switches, and refrigerants. The HWMP should state that all vehicles must be thoroughly depolluted prior to recycling or disposal.

In addition to the above, Version 2.0 of the HWMP has been revised to reflect the Government of the Northwest Territories' Guidelines for Hazardous Waste Management.

Spill Contingency Plan (SCP)

1. Describe standard operating procedures for the transfer of hazardous materials: specifically fuel and fuel distillates;
2. Provide remedial actions for all hazardous materials encountered;
3. Describe spill training;
4. Provide thresholds for when spills should be reported;
5. Update contact information for Off-site Resources such as ENR's Hazardous Substances Specialist and the GNWT Inspector.

In addition to the above, Version 2.0 of the SCP has been revised to reflect the layout to follow the GNWT's *Operation and Maintenance Plan Templates for Municipal Water Licences: Spill Contingency Plan*.

Using the Online Review System (ORS), reviewers are invited to submit comments and recommendations on the documents linked below by the review comment deadline specified. Reviewers may also wish to consider providing an overarching recommendation regarding whether the Board should approve the submission, to provide context for the comments and recommendations and assist the Board with its decision. If reviewers seek clarification on the submission, they are encouraged to correspond directly with the Applicant prior to submitting comments and recommendations.

All documents have been uploaded to this review are also available on our public registry. If you have any questions or comments about the ORS or this review, please contact Board staff identified below.

Contact Information:

Anneli Jokela 867-765-4588

Jessica Pacunayen 867-765-4591

Comment Summary

GNWT - ENR - EAM (Environmental Assessment and Monitoring): Central Email GNWT				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
1	General File	<p>Comment (doc) ENR Letter - No Comment or Recommendations at this time.</p> <p>Recommendation</p>		
WLWB: Jessica Pacunayen				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
1	Spill Response Contacts, CGB Responsible Parties, and Off-site Resources (Table 2, 3, and Section 2.5 of the Spill Contingency Plan)	<p>Comment Board staff were informed of recent staff changes at the CGB. Staff also note that recent changes to the GNWT directory may affect contact info included in the list of off-site resources.</p> <p>Recommendation Please confirm if the contacts included in Tables 2 and 3, as well as Section 2.5 of the Spill Contingency Plan, are up-to-date. If not, please provide an updated list.&nbsp;</p>	Feb 23: BluMetric will update Table 2 and 3 with new contact information for Water Manager and SAO.	
2	Landfarm and Management of Hydrocarbon-contaminated Wastes (Tables 5	<p>Comment Table 5 indicates that hydrocarbon-contaminated soil, snow, or water are treated at the Landfarm; however, based on previous correspondence and information</p>	Feb 23: Hydrocarbon-contaminates snow, soil and water are being contained in drums or collected by contractor as indicated in Table 7.	

	and 7 of the Spill Contingency Plan)	<p>provided through the public review of the Landfarm Soil Use Request, Board staff understand that no new material is being added to the Landfarm. Meanwhile, note 1 of Table 7 indicates that hydrocarbon-contaminated snow, soil, or water, are considered "Household Hazardous Wastes" and are segregated and temporarily stored in a sea can prior to offsite disposal (as indicated in Table 7).</p> <p>Recommendation (1) Please clarify how and where hydrocarbon-contaminated snow, soil, and water are being stored and disposed of. (2) If any of these materials are being placed in the Landfarm, please provide rationale for why the CGB believes that is appropriate at this time.</p>	BluMetric will correct the information in Table 5.	
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February 11, 2021

Joseph Mackenzie
Chair
Wek'èezhì Land and Water Board
#1-4905 48th Street
Yellowknife, NT
X1A 3S3

Dear Mr. Mackenzie,

**Re: Community Government of Behchoko
Type B Water Licence - W2014L3-0002
Hazardous Waste Management Plan and Spill Contingency Plan Ver. 2.0
Request for Review and Comments**

The Department of Environment and Natural Resources, Government of the Northwest Territories has reviewed the plans at reference based on its mandated responsibilities under the *Waters Act*, the *Species at Risk (NWT) Act*, and the *Wildlife Act* and has no comments or recommendations for the consideration of the Board at this time.

Should you have any questions or concerns, please do not hesitate to contact Patrick Clancy, Environmental Regulatory Analyst at (867) 767-9233 Ext: 53096 or email patrick.clancy@gov.nt.ca.

Sincerely,

Patrick Clancy
Environmental Regulatory Analyst
Environmental Assessment and Monitoring Section
Environmental Stewardship and Climate Change Division
Department of Environment and Natural Resources
Government of the Northwest Territories

Distribution List

Community Government of Behchoko - Hazardous Waste Management Plan and Spill Contingency Plan - Version 2.0 (W2014L3-0002)

File(s): W2014L3-0002

Proponent: Community Government of Behchoko

Reviewer Comments Due By: Feb 11, 2021

Proponent Comments Due By: Feb 25, 2021

Document(s)

Hazardous Waste Management Plan Version 2.0

Spill Contingency Plan - Version 2.0

Contact Information

Anneli Jokela 867-765-4588(ajokela@wlwb.ca)

Jessica Pacunayen 867-765-4591(jpacunayen@wlwb.ca)

Sent To		
Organization	User	Email
Akaitcho IMA Implementation Office	Poole, Stephanie	screeningofficer@eastarm.com
Canadian Northern Economic Development Agency - NWT Region	Paradis, Adrian	adrian.paradis@canada.ca
CIRNAC - Inspector	Morton, Tim	tim.morton@canada.ca
Community Government of Behchoko	Daniels, Clifford	clifforddaniels@tlichocom
Community Government of Behchoko	Gon, Ritalene	landoffice@behchoko.ca
Community Government of Behchoko	Richardson, Treeva	sao@behchoko.ca
Community Government of Gameti	SAO, Gameti	sao@gameti.org
Community Government of Wekweeti	Wekweeti, SAO	wekwetisao@northwestel.net
Community Government of Whati	Nitsiza, Alfonz	alfonznitsiza@tlichocom
Community Government of Whati	SAO, Whati	sao@whati.ca
Deninu K'ue First Nation	Simon, Richard	ima@dkfn.ca
Deninu K'ue First Nation	Simon, Patrick	patricksimon777@yahoo.ca
Environment and Climate Change Canada	Environment and Climate Change Canada, EA	ec.eenordrpntno-eanorthpnrnwt.ec@canada.ca
Fisheries and Oceans Canada	Coombs, Dan	daniel.coombs@dfo-mpo.gc.ca
Fisheries and Oceans Canada	Fisheries Protection Program, Triage Group	fisheriesprotection@dfo-mpo.gc.ca
Fisheries and Oceans Canada	Dupuis, Lynn	Lynn.Dupuis@dfo-mpo.gc.ca
Fisheries and Oceans Canada	Fisher, Neil	Neil.Fisher@dfo-mpo.gc.ca
Fisheries and Oceans Canada	Gervais, Rick	Richard.Gervais@dfo-mpo.gc.ca
Forward Mining	Mauchan, Jason	info@forwardmining.ca

GLWB	Macdonald, AlecSandra	AMacDonald@glwb.com
GNWT - ENR (Environment and Natural Resources)	Somers, Gila	Gila_Somers@gov.nt.ca
GNWT - ENR (Environment and Natural Resources)	McGregor, Laurie	laurie_mcgregor@gov.nt.ca
GNWT - ENR (Environment and Natural Resources)	Richea, Nathen	Nathen_Richea@gov.nt.ca
GNWT - ENR (Environment and Natural Resources)	Clancy, Patrick	patrick_clancy@gov.nt.ca
GNWT - ENR (Environment and Natural Resources)	Walbourne, Rick	Rick_Walbourne@gov.nt.ca
GNWT - ENR - EAM (Environmental Assessment and Monitoring)	GNWT, Central Email	gnwt_ea@gov.nt.ca
GNWT - ENR - North Slave Region	McQuinn, David-Scott	David-Scott_McQuinn@gov.nt.ca
GNWT - ENR - North Slave Region	Beck, Heather	Heather_Beck@gov.nt.ca
GNWT - Executive and Indigenous Affairs	Fast, Peter	Peter_Fast@gov.nt.ca
GNWT - HSS (Health and Social Services)	Department , of Health	Environmental_health@gov.nt.ca
GNWT - INF (Infrastructure)	Campbell, Alexis	Alexis_Campbell@gov.nt.ca
GNWT - INF (Infrastructure)	Bey, Benjamin	Benjamin_Bey@gov.nt.ca
GNWT - INF (Infrastructure)	Posynick, Jon	Jon_Posynick@gov.nt.ca
GNWT - ITI (Industry, Tourism and Investment)	Mason, Dane	Dane_Mason@gov.nt.ca
GNWT - ITI (Industry, Tourism and Investment)	Elliott , Dinah	Dinah_Elliott@gov.nt.ca
GNWT - ITI (Industry, Tourism and Investment)	Johnson, Kris	k_Johnson@gov.nt.ca
GNWT - ITI (Industry, Tourism and Investment)	Robb, Malcolm	Malcolm_Robb@gov.nt.ca
GNWT - ITI (Industry, Tourism and Investment)	McEachern, Menzie	Menzie_McEachern@gov.nt.ca
GNWT - Lands	Rozestraten, Katie	katie_rozestraten@gov.nt.ca
GNWT - Lands	Pink, Melissa	melissa_pink@gov.nt.ca
GNWT - Lands - North Slave Region	Bradbury, Brandon	Brandon_Bradbury@gov.nt.ca
GNWT - Lands - North Slave Region	Coe, Charlene	Charlene_Coe@gov.nt.ca
GNWT - Lands - North Slave Region	Larocque, Cheryl	cheryl_larocque@gov.nt.ca
GNWT - Lands - North Slave Region	Ambrose, Clint	clint_ambrose@gov.nt.ca
GNWT - Lands - North Slave Region	Lee, Nahum	Nahum_Lee@gov.nt.ca
GNWT - Lands - North Slave Region	Stewart, Scott	Scott_Stewart@gov.nt.ca
GNWT - MACA (Municipal and Community Affairs)	Arshad, Iqbal	Iqbal_Arshad@gov.nt.ca
GNWT - MACA (Municipal and Community Affairs)	Lee, Olivia	Olivia_Lee@gov.nt.ca

GNWT - PPCA (Policy, Planning, Communications and Analysis (w/in ITI))	Walz, Evan	Evan_Walz@gov.nt.ca
GNWT - PWNHC (Prince of Wales Northern Heritage Centre (w/in ECE))	Mackay, Glen	Glen_Mackay@gov.nt.ca
GNWT - PWNHC (Prince of Wales Northern Heritage Centre (w/in ECE))	Smethurst , Naomi	naomi_smethurst@gov.nt.ca
Kitikmeot Inuit Association	Clark, Geoff	dirlands@kitia.ca
Lutsel K'e Dene First Nation - Chief or Wildlife, Lands and Environment	Marlowe, Chief Daryl	chief.lkdfn@gmail.com
Lutsel K'e Dene First Nation - Chief or Wildlife, Lands and Environment	Guthrie, Glen	lkdfnlands@gmail.com
Lutsel K'e Dene First Nation - Chief or Wildlife, Lands and Environment	Keats, Beth	lkdfnregulatory@gmail.com
Mackenzie Valley Environmental Impact Review Board	Cliffe-Phillips, Mark	mcliffephillips@reviewboard.ca
Mackenzie Valley Environmental Impact Review Board	MVEIRB, Generic	preliminaryscreening@reviewboard.ca
MVLWB	Plautz, Angela	aplautz@mvlwb.com
MVLWB	Potten, Jen	jpotten@mvlwb.com
North Slave Metis Alliance	Taylor, Joanne	general@nsma.net
North Slave Metis Alliance	Enge, Susan	heritage@nsma.net
North Slave Metis Alliance	Hurtubise, Jess	jess.hurtubise@nsma.net
North Slave Metis Alliance	Lands, NSMA	lands@nsma.net
Northwest Territories Power Corporation	Dewar, David	ddewar@ntpc.com
Northwest Territories Power Corporation	Miller, Matthew	mmiller@ntpc.com
Northwest Territory Metis Nation	Coleman, Ria	lands.clerk@nwtmetis.ca
Tlicho Government	Wheler, Brett	brett.wheler@tlicho.ca
Tlicho Government	George Mackenzie, Grand Chief	georgemackenzie@tlicho.com
Tlicho Government	Lands Regulatory, Tlicho	ginger.gibson@thefirelightgroup.com
Tlicho Government	Mackenzie, Grace	gracemackenzie@tlicho.com
Tlicho Government	EKWE, LONGINUS	longinusekwe@tlicho.com
Tlicho Government	Richardson, Sean	seanrichardson@tlicho.com
Tlicho Government	Nevitt, Zabey	zabeynevitt@tlicho.com
Tlicho Lands Protection Department	Washie, Doreen	doreenwashie@tlicho.com
Tlicho Lands Protection Department	Huskey, Joline	jolinehuskey@tlicho.com
Tlicho Lands Protection Department	Steinwand, Tyanna	tyannasteinwand@tlicho.com
Tlicho Lands Protection Department	Camsell-Blondin, Violet	violetcamsellblondin@tlicho.com

Wek' eezhii Renewable Resources Board	Guile, Aimee	aguile@wrrb.ca
Wek' eezhii Renewable Resources Board	Pellissey, Jody	jpellissey@wrrb.ca
Wek' eezhii Renewable Resources Board	Meinert, Laura	lmeinert@wrrb.ca
Wek' eezhii Renewable Resources Board	Norrish, Shalyn	snorrish@wlwb.ca
Wekweeti Community Government	Football, Charlie	charliefootball@tlicho.com
WLWB	Jokela, Anneli	ajokela@wlwb.ca
WLWB	Pacunayen, Jessica	jpacunayen@wlwb.ca
WLWB	DeFrancis, Kassandra	kdefrancis@wlwb.ca
WLWB	MacIntyre-Newell, Meaghan	mmacintyre-newell@wlwb.ca
WLWB	Schnurr, Meghan	mschnurr@wlwb.ca
WLWB	Ewaschuk, Patty	pewaschuk@wlwb.ca
WLWB	Bams, Rhiana	rbams@wlwb.ca
WLWB	Fequet, Ryan	rfequet@wlwb.ca
WLWB	Judas, Roberta	rjudas@wlwb.ca
WLWB	Water Board, Wekeezhii Land and	wlwb06@gmail.com
Wood	Malavige, Perera	malavige.perera@woodplc.com
Yellowknives Dene First Nation	Black, Johanne	jblack@ykdene.com
Yellowknives Dene First Nation	YKDFN, Admin	lands@ykdene.com
Yellowknives Dene First Nation	Miller, Ryan	ryanm@ykdene.com
Yellowknives Dene First Nation	Gillis, Sarah	saraht@ykdene.com