

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>	<p>Feb 23: BluMetric will update Table 2 and 3 with new contact information for Water Manager and SAO.</p>	
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>	<p>Feb 23: Hydrocarbon-contaminates snow, soil and water are being contained in drums or collected by contractor as indicated in Table 7.</p>	

	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

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