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March 23, 2021

File: W2014L3-0002

Graeme Drew
SAO, Community Government of Behchokq
P.O. Box 68
Behchokq, NT
X0E 0Y0

sent by email

Dzè nezì Graeme,

Re: Versions 2.0 of the Hazardous Waste Management Plan, Spill Contingency Plan, and Closure and Reclamation Plan (W2014L3-0002)

The Wek'èezhii Land and Water Board (WLWB or the Board) met on March 18, 2021 and considered Versions 2.0 of the Community Government of Behchokq's (CGB) Hazardous Waste Management Plan (HWMP), Spill Contingency Plan (SCP), as well as the Closure and Reclamation Plan (CRP) for the former Solid Waste Facility (SWF).

The Board has approved Versions 2.0 of the HWMP, SCP, and the CRP with additional direction. Within 30 days, the Board expects CGB to:

1. Submit Version 2.1 of the SCP (see Decisions #2 and #3 of the Reasons for Decision of the HWMP and SCP); and
2. Review its SNP and either (see Decision #2 of Reasons for Decision of the SWF CRP):
 - a. Submit to the Board a request to change the SNP, or
 - b. Provide rationale to the Board if the CGB believes that no changes to the SNP are necessary.

Version 2.1 of the SWF CRP is also required 30 days prior to closure activities with details outlined in the Reasons for Decision. Please review the attached Reasons for Decision for further information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joseph Mackenzie".

Joseph Mackenzie
Chair, Wek'èezhii Land and Water Board

Blind Copied to: Wek'èezhii Distribution List

Attached: Reasons for Decision for Versions 2.0 of the HWMP and SCP
Reasons for Decision for Version 2.0 of the CRP for the former SWF



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Reasons for Decision

Reference/File Number:	W2014L3-0002
Permittee/Licensee:	Community Government of Behchokq
Subject:	Hazardous Waste Management and Spill Contingency Plans – Versions 2.0

Decision from the Wek'èezhìi Land and Water Board Meeting of March 18, 2021

1.0 Decision

The Wek'èezhìi Land and Water Board (WLWB or the Board) met on March 18, 2021 and considered Versions 2.0 of the Community Government of Behchokq's (CGB) Hazardous Waste Management Plan (HWMP) and Spill Contingency Plan (SCP).^{1,2}

In consideration of the submissions, reviewer comments, and proponent responses, the Board has approved Versions 2.0 of the HWMP and SCP with further direction.

2.0 Background

The CGB submitted Version 2.0 of its HWMP and Version 2.0 of its SCP on November 9, 2020. These plans were requested by the Board on October 27, with the issuance of W2014L3-0002.³ In Appendix A of the Reasons for Decision, the Board required the CGB to make the following revisions to the following Plans:

Hazardous Waste Management Plan (HWMP)

- Secondary containment is needed for the hazardous materials depot; and
- 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.

¹ See WLWB Online Registry (www.wlwb.ca) for [W2014L3-0002 – Behchoko – Hazardous Waste Management Plan – V2.0 – Nov 9 20](#)

² See WLWB Online Registry for [W2014L3-0002 – Behchoko – Spill Contingency Plan – Version 2.0 – Nov 9 20](#)

³ See WLWB Online Registry for [W2014L3-0002 – Behchoko – Water Licence – Reasons for Decision – Oct 27 14](#)

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*.⁴

Spill Contingency Plan (SCP)

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

Version 2.0 of the SCP has also been revised to reflect the layout suggested by the MVLWB/GNWT's *Operation and Maintenance Plan Templates for Municipal Water Licences: Spill Contingency Plan*.⁵

Version 2.0 of the HWMP and the SCP were distributed for public review on November 25, 2020 with reviewer comments due by February 11, 2021. Only Board staff submitted questions. The Government of the Northwest Territories – Environment and Natural Resources responded that they had no comments or recommendations at this time. Proponent responses were submitted by the deadline on February 25, 2021. Reviewer comments and recommendations, as well as the proponent’s responses, are available on the WLWB Online Registry.⁶

3.0 Reasons for Decision

3.1 Conformity Check

The Board reviewed the revisions made in Versions 2.0 of the HWMP and the SCP for conformity with the Board’s 2014 direction (see Table 1 below). Where further clarification was required, Board staff have followed up with CGB/BluMetric.

Table 1: Conformity Check against the Board’s 2014 Direction

Required Revision from the 2014 Board Decision	Inclusion in Version 2.0	Board Notes
HWMP: Describe the need for secondary containments for the hazardous materials depot	Yes – Section 3.2	
HWMP: Indicate that all vehicles are cleared of any pollutants (fluids, lead acid batteries, mercury)	Yes – Section 3.3	

⁴ https://www.enr.gov.nt.ca/sites/enr/files/resources/128-hazardous_waste-interactive_web.pdf

⁵ See ‘Resources for Municipalities’ page for [Templates for Municipal Water Licences: Spill Contingency Plan](#)

⁶ See WLWB Online Registry for [W2014L3-0002 – Behchoko – SCP – V2.0 – Review Summary and Attachments – Feb 25 21](#)

switched, and refrigerants) prior to recycling or disposal		
SCP: Describe Standard Operating Procedures (SOPs) for the transfer of hazardous materials (fuel, fuel distillates, etc.)	No*	Section 2.11.6 of the SCP describes procedures for transferring, storing, and managing Spill Related Waste; however, it is not clear what the procedures are for transferring hazardous materials before they are spilled. Board staff followed up with BluMetric via email on the Standard Operating Procedures for the transfer of hazardous materials (see section 3.3).
SCP: Describe remedial actions for all hazardous materials encountered	Yes - Section 2.11.7	
SCP: List spill training	Yes - Section 2.1.13	
SCP: Specify reporting thresholds for spills	Yes - Appendix B	
SCP: Revise contact information for off-site resources	Yes - Section 2.5	

3.2 Hazardous Waste Management Plan

As per Table 1, the Board is of the opinion that Version 2.0 of the HWMP is reflective the Board's previous direction and does not believe the revision to reflect the Government of the Northwest Territories' *Guidelines for Hazardous Waste Management* would prevent the Board from approving the Plan. Additionally, no comments were received by any Party regarding changes made to this Plan. As such, the Board has approved Version 2.0 of the HWMP.

- **Decision #1: The Board approves Version 2.0 of the Hazardous Waste Management Plan.**

3.3 Spill Contingency Plan

During the public review, only Board staff provided questions on Version 2.0 of SCP (Board staff comment 1 and 2). The previous version of the SCP was submitted with the Water Licence renewal Application in 2014 and Board staff were made aware of several changes since then, including changes to CGB staff and plans for the Landfarm. Board staff were informed of recent staff changes at the CGB and understand that the Landfarm is planned to be closed and not receiving additional material (i.e., hydrocarbon-contaminated soil, snow, or water). During the public review Board staff sought clarification on whether the contacts included in the SCP were up-to-date, as well as clarification regarding the storage and

disposal methods for hydrocarbon-contaminated materials since the Landfarm was no longer in use. In CGB/BluMetric's response, CGB/BluMetric committed to provide updated tables (Tables 2, 3, and 5) to reflect updated contact information for the Water Manager and SAO. CGB/BluMetric also committed to reflect updated methods for storing and disposing hydrocarbon-contaminated materials (i.e., segregated and stored in drums in a seacan for offsite disposal). The Board has not identified any issues with CGB/BluMetric's responses and believes these revisions can be added in the SCP Version 2.1.

As noted in Table 1, Version 2.0 of the SCP did not include a description of standard operating procedures for the transfer of hazardous materials, only hazardous wastes. This direction was derived from a comment by GNWT-ENR during the review of the original Licence application. No concerns were raised during the public review by other reviewers, including GNWT-ENR. However, Board staff followed up with CGB/BluMetric on March 8, 2021 for clarity on the CGB's preventative spill measures.⁷ BluMetric explained in its response that the CGB will ensure that all staff will be properly trained to ensure they can handle and transfer fuel, in addition to hazardous waste, to prevent spills and contamination. Only those who have had experience or are licensed will be able to handle fuel or hazardous waste. The Board believes this response satisfies the intent of the Board's direction.

Overall, the Board does not believe there is anything that would prevent the Board from approving this Plan and reiterates that the additional revisions noted above could be included in a revised SCP (Version 2.1) to provide further clarity. To ensure that the updated contacts are readily available if and when a spill occurs, the revised SCP should be submitted no later than 30 days after the Board's decision.

- ***Decision #2: The Board approves Version 2.0 of the Spill Contingency Plan and directs CGB to submit Version 2.1 of the SCP to include the information committed in response to Board staff comment 1 and 2, as well as details regarding the standard operating procedures for the transfer of fuel.***

- ***Decision #3: The Board directs the CGB to submit Version 2.1 of the SCP be submitted no later than 30 days after the Board's decision.***

Signed the 23rd Day of March, 2021, on behalf of the Wek'èezhii Land and Water Board



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Joseph Mackenzie
Chair, Wek'èezhii Land and Water Board

⁷ See WLWB Online Registry for [W2014L3-0002 - Behchoko - SCP - V2.0 - Correspondence with BluMetric - Mar 11 21](#)



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Reasons for Decision

Reference/File Number:	W2014L3-0002
Permittee/Licensee:	Community Government of Behchokq
Subject:	Solid Waste Facility Closure and Reclamation Plan – Version 2.0

Decision from the Wek'èezhìi Land and Water Board Meeting of March 18, 2021

1.0 Decision

The Wek'èezhìi Land and Water Board (WLWB or the Board) met on March 18, 2021 and considered the Community Government of Behchokq's (CGB) Solid Waste Facility (SWF) Closure and Reclamation Plan (CRP) Version 2.0.¹ A CRP for the SWF is required by Part I, Condition 1 of the Water Licence (W2014L3-0002).²

In consideration of the submission, reviewer comments, and proponent responses, the Board has approved Version 2.0 of the CRP with further direction.

2.0 Background

The former Solid Waste Facility for the Community of Behchokq has been operating since 1965.³ As per Part I, Condition 1 of Water Licence W2014L3-0002, the CGB is required to submit a CRP six months prior to closure any of its Sewage or Solid Waste Disposal Facilities. The purpose of the CRP is to provide detailed information on the closure of the facility and the information required in the CRP is set out in Schedule 4 of the Licence.

A CRP was submitted with the Licence Application in 2014 and was prepared by WESA (a division of BluMetric) in March 2014. During the issuance of Water Licence W2014L3-0002 in 2014, the Board approved Version 1.0 of the CRP for the former Solid Waste Facility with additional direction to submit an Implementation Schedule as soon as possible.⁴ A preliminary implementation schedule was submitted in

¹ See WLWB Online Registry (www.wlwb.ca) for [W2014L3-0002 – Behchoko – SWF – Closure and Reclamation Plan for Existing Site – V2.0 – Nov 4 20](#)

² See WLWB Online Registry for [W2014L3-0002 – Behchoko – Water Licence – Rectification of Clerical Errors – Jul 24 15](#)

³ See WLWB Online Registry for [W2014L3-0002 – Behchoko – SWF – Closure and Reclamation Plan for Existing Site – V2.0 – Nov 4 20](#)

⁴ See WLWB Online Registry for [W2014L3-0002 – Behchoko – Water Licence – Reasons for Decision – Oct 27 14](#)

2017.⁵ Unfortunately due to delays from “weather issues, operational challenges and sourcing appropriate borrow material for construction of the new landfill site, landfilling in the former SWF continued until 2019.”⁶

Version 2.0 of the CRP was prepared by BluMetric on behalf of the CGB on November 4, 2020 with plans to permanently close the former facility in Spring 2021. The CRP was distributed for public review on November 25, 2020 and reviewer comments were due by January 21, 2021. Comments on the submission were received from the Government of the Northwest Territories Department of Environment and Natural Resources Environment; Board staff also submitted questions. The Wek’èezhìi Renewable Resources Board (WRRB) responded that they had no comments or recommendations at this time. Proponent responses were submitted by the deadline of February 4, 2021. Reviewer comments and recommendations, as well as the proponent’s responses, are available on the WLWB Online Registry.⁷

3.0 Reasons for Decision

3.1 Changes to the CRP

Section 4 of the approved 2014 CRP included details on the final contours, final cover, end use, and post-closure care (e.g., maintenance and inspection and environmental monitoring) for the closure of the former SWF. These details were approved when the 2014 Licence was issued. In Version 2.0, CGB has proposed the following changes:

- Raised design elevations to accommodate additional solid waste accumulated since 2014;
- Management of ponded water that was observed “based on reconnaissance since the March 2014 Closure and Reclamation Plan was prepared” (see further discussion in section 3.2); and
- Closure of the Landfarm. The CGB indicated in the 2014 CRP that the landfarm would remain operational; however, the CGB has since decided that it will cease operations at the Landfarm and work towards reclaiming it. CGB/BluMetric committed to submit a separate Landfarm CRP as per Part I of the Water Licence (i.e., six months prior to closure).

3.2 North West (NW) Ponded Water Management

As noted above, in Version 2.0 of the CRP, CGB/BluMetric identified ponded water directly adjacent to the NW corner of the waste mound. CGB/BluMetric proposes to have the NW ponded area pumped dry to remove any fallen waste material back and the water to be placed in either an adjacent waterbody or placed in a “temporary sump within the waste mound”. A water quality sample was collected in 2019 and compared to CCME Water quality Guidelines for Freshwater (long-term) as well as the Landfarm effluent criteria (located within Part D, Condition 19 of the Licence). These results were provided in the CRP and

⁵ See WLWB Online Registry for [W2014L3-0002 – Behchoko – Solid Waste Facility – 2017 Schedule – Preliminary Schedule of Land Fill Closure – Jun 15 17](#)

⁶ See WLWB Online Registry for [W2014L3-0002 – Behchoko – SWF – Closure and Reclamation Plan for Existing Site – V2.0 – Nov 4 20](#) and [W2014L3-0002 – Behchoko – Landfill Update – Aug 17 18](#)

⁷ See WLWB Online Registry for [W2014L3-0002 – Behchoko – SWF – CRP – V2.0 – Review Summary and Attachments – Feb 4 21](#)

four (4) exceedances were noted by CGB/BluMetric in comparison to the CCME Criteria and one (1) against the Landfarm effluent Criteria.⁸ It is noted that Manganese also exceeded the Landfarm effluent criteria.

During the public review, Board staff asked CGB to provide additional details on the proposed management of the ponded water. Board staff requested CGB provide confirmation as to whether pumping the ponded water from the SWF to an adjacent waterbody was authorized by its Water Licence and requested CGB to provide additional details on the receiving waterbody and contingencies/alternatives if using a sump is not an option. CGB/BluMetric responded by stating that “this body of water is not considered surface water management pond, but just a natural depression located adjacent to the landfarm and landfill” and committed to take a secondary sample closer to excavation date. CGB/BluMetric also committed to provide further information to the addendum to describe management of the storm water.

Based on the review of the Licence, there are no conditions in the Licence that have contemplated wastewater originating from the Solid Waste Facility (outside the landfarm) and would allow the discharge of Waste into any waterbody. Part D, Condition 21 of the Licence states, “the Licensee shall ensure that any unauthorized Wastes associated with the municipal undertaking do not enter any Waters.” Therefore, CGB/BluMetric’s proposed option to pump the ponded water to a nearby waterbody would not be authorized by the Licence.

As per rule #61 of the Board’s Rules of Procedure, an Information Request (IR) was issued to CGB/BluMetric on March 8, 2021 to further understand alternative options of the management of the NW ponded water.⁹ Additional details were requested on the volume of water to be removed, the location and potential environmental concerns with the use of a temporary sump, and closure alternatives to manage the ponded water. In its March 10th response¹⁰ to the IR, BluMetric (on behalf of CGB) stated that it anticipates up to 420,000 litres may need to be pumped to temporarily dewater this area. The sump is planned to be set on the top portion of the waste mound at a minimum of 105 metres (m) from the nearest waterbody south of the waste mound. It is also expected that continuous inspections of the sump will occur to ensure no overtopping occurs and to observe any leachate discharge or seepage. BluMetric explained that the water entering the sump is expected to seep into the ground and naturally attenuate, which is “consistent with the existing conceptual model for leachate originating from his natural attenuation landfill site”. If the water is to be sent to the sewage lagoon as a contingency option, BluMetric would sample the water for parameters against the effluent criteria for the sewage lagoon.

Based on the review of the information provided during the public review and mitigations outlined in the IR response, the Board does not believe the disposal of the NW ponded water in a temporary sump within the waste mound would result in an adverse impact to the Receiving Environment. It is the Board’s understanding is that the Licence does not restrict the disposal of ponded water from the SWF into the waste mound. The Board notes that during the public review, no reviewers raised concerns with CGB’s proposed management or the water quality results of the NW ponded water. A sump located at least 100

⁸ According to the CRP, results that were collected in 2019 met CCME water Quality Guidelines except for Aluminum, Iron, Zinc, Faecal Coliforms, and Fluoride. Iron concentration also exceed effluent criteria for the Landfarm.

⁹ See WLWB Online Registry for [W2014L3-0002 – Behchoko – SWF – CRP – V2.0 – Information Request – Mar 8 21](#)

¹⁰ See WLWB Online Registry for [W2014L3-0002 – Behchoko – SWF – CRP – V2.0 – Response to Information Request – Mar 10 21](#)

m away from the nearest surface waterbody is also consistent the Board's standard water licence conditions¹¹ and the discharge location for effluent from the nearby Landfarm (Part D, Condition 19(c)). Furthermore, the Board acknowledges that CGB/BluMetric has committed to providing a secondary water sample closer to pumping of the ponded water and that a groundwater well is installed under GNWT-Municipal and Community Affairs (GNWT-MACA) permit W2016X0001 at the former SWF that may be able to detect any potential contamination. CGB and BluMetric committed to investigating the results from groundwater monitoring program from GNWT-MACA (see response to Board staff comment 8).

Overall, the Board does not believe there are any major issues that would prevent the Board from approving the CRP. The primary changes that were made to the CRP did not alter the overall plan to close the site, only to adjust for current conditions. The Board notes that the change to address water management for the NW ponded area that was included in the addendum is new and was not included the original 2014 CRP. The Board believes that the issues raised during the public review related to the NW ponded water has been addressed and others (as discussed below) can be addressed through recommendations in the following sections. Therefore, the Board approves Version 2.0 of the CRP for the former SWF so the CGB can commence planning for implementation this calendar year.

- ***Decision #1: The Board approves Version 2.0 of the Closure and Reclamation Plan for the former Solid Waste Facility.***

3.3 Outstanding Issues

3.3.1 SNP Station 2014-R5 (previously 0041-R8)

In the CRP that was approved in 2014, CGB/BluMetric referenced a Surveillance Network Program (SNP) station (0041-R8) from an older Water Licence (MV2003L3-0100). This station was planned to be kept under the SNP to monitor runoff from the new SWF. This old reference was included because Version 1.0 of the CRP was submitted with the Water Licence Application (i.e., prior to the current W2014L3-0002 Licence number and naming conventions for the SNP stations). Since the CGB/BluMetric added an addendum in Version 2.0 to reflect the changes from the approved CRP in 2014, none of the old references were changed. In the current licence, this SNP station is referred to as SNP Station 2014-R5 and is responsible for monitoring water quality runoff from the former SWF. Several years have passed since the first approved CRP and with the opening of the new SWF in 2019, it was not clear if R5 was still appropriate in monitoring runoff from the new SWF.

During the public review, both Board staff and GNWT-ENR asked questions surrounding the ability for SNP station 2014-R5 to monitor runoff from the new facility. Board staff asked if this SNP station was still an appropriate location to monitor potential runoff of the new SWF (Board staff comment 6). GNWT-ENR recommended that the CGB "discuss (with associated rationale or evidence) if runoff captured by SNP 2014-R5 for the former SWDF may also possibly be capturing some of the runoff from the new SWDF, located adjacent to the former SWDF" (GNWT-ENR comment 3). In response to both Board staff and GNWT-ENR's comments, CGB/BluMetric committed to provide "new SNP locations recently added" in revised drawings (response to GNWT-ENR comment 3; Board staff comment 6).

¹¹ See the Boards' "Policies and Guidelines" page for the [MVLWB Standard Water Licence Conditions and Schedules \(2020\)](#)

It was not clear what CGB/BluMetric meant in its response by “new SNP locations” or when this information would be provided. Regardless, the Board does not believe the details surrounding SNP stations are necessary for the Board to make a decision on the CRP of the former SWF. The Licence allows the Board to make amendments to the SNP (Part B, Condition 3) and so if there are changes to 2014-R5 or new stations that need to be added, the Board believes that this issue be handled through an SNP change request. The Board requires the CGB/BluMetric to review its SNP and, if necessary, submit a request to change the SNP change request within 30 days of the Board’s decision.

- ***Decision #2: The Board directs CGB to review its SNP, and within 30 days of the Board’s decision, either:***
 - a. submit a request to change the SNP; or***
 - b. provide rationale if the CGB believes that no changes to the SNP are necessary.***

3.3.2 Photos of Existing Conditions, Implementation Plan, and a Map of Borrow Material Locations

Schedule 4 of the Water Licence Requires the CGB to submit an implementation schedule as well as photos of existing conditions. Neither of these requirements were included in the CRP. Similarly, Schedule 4 of the Water Licence requires CGB to provide the type and source of cover materials and maps of borrow source materials. Section 4.2 of the CRP describes that a total volume of 20,466 cubic metres (m³) of low permeability soil will be used for a final cover; however, the source of this cover material was unclear and no maps were provided.

During the public review, Board staff asked CGB/BluMetric to provide a map of the source for final cover materials, an implementation plan, and photos of existing conditions (Board staff comment 4, 10, and 11). In response to Board staff’s comments, CGB/BluMetric provided photos taken in February and committed to submit an Implementation Schedule in the summer pending approval of the CRP and anticipated funding for closure of the former SWF. CGB/BluMetric also committed to include a drawing that identifies the proposed borrow locations for low permeability. No timeline or location was provided on how this drawing would be submitted.

The Board is of the opinion that CGB/BluMetric’s proposal to satisfy these requirements is reasonable as the Board does not believe it would impact how the CRP would be closed. No concerns were raised by Parties regarding these omissions. However, the Implementation Plan should be submitted no later than 30 days prior to conducting closure activities to ensure all Parties and the Inspector are aware of when closure activities are taking place. The drawing outlining the borrow source location can be provided as an appendix in a revised CRP (Version 2.1) with the implementation Schedule at the same time.

- ***Decision #3: The Board directs CGB to submit Version 2.1 of the SWF CRP to the Board with an Implementation Schedule 30 days prior to conducting closure activities of the former SWF.***
- ***Decision #4: The Board directs CGB to submit a drawing of the borrow source location used for cover materials in an appendix of Version 2.1 of the CRP 30 days prior to conducting closure activities.***

3.3.3 Old References and Updated drawings

As noted above, there were several older references included in the CRP. In the public review, GNWT recommended that “the Water Licence file number and SNP information provided in the Community Government of Behchokq CRP (Section 5.2, and elsewhere) be updated to reflect the current Water Licence file number and SNP naming conventions and descriptions, as outlined in Behchokq Water Licence (W2014L3-0002).” To keep all the information in one place, GNWT-ENR recommended that CGB/BluMetric provide a “separated updated new version of the CRP (likely Version 3), along with the associated current date”, noting that proponents are “typically required to incorporate revisions within an updated plan version that is subsequently submitted to the Board” (GNWT-ENR comment 4). In response to GNWT-ENR, CGB/BluMetric stated that “it was decided to take the approach on issuing an addendum since version 1 was already approved and very few changes were being proposed, strictly to address a few changes in site conditions...[and that] by issuing an addendum, it was considered that this would create efficiencies in reporting, review and approval to undertake the closure in 2021.”

GNWT-ENR also recommended that drawings in the CRP be updated to reflect the location of the NW ponded area, current naming conventions for the SNP, and to include a drawing to reflect the various waste types used in each area of the SWF (GNWT-ENR comment 2, 5, 6). GNWT-ENR recommended these be provided prior to applying the final cover over the former SWF. CGB committed to updating the drawings as recommended by GNWT-ENR.

The Board notes that only GNWT-ENR raised issues with the format of the Plan and believe CGB has clearly identified what has changed since the approved 2014 CRP. The Board is of the opinion that the recommended updates to the drawings would not affect the ability for CGB/BluMetric to move forward with closure of the former SWF. Therefore, these drawings can be provided at a later date and recommend that CGB/BluMetric provide updated drawings as committed to by CGB/BluMetric in response to GNWT-ENR comments 1, 2, 5, and 6 in an appendix of a revised CRP (Version 2.1) 30 days prior to closure activities.

- ***Decision #5: The Board directs CGB to submit updated drawings, as committed to by CGB/BluMetric in response to GNWT-ENR comments 1, 2, 5, and 6 in an appendix of Version 2.1 of the CRP 30 days prior to closure activities.***

If a change to the SNP is requested and approved by the Board (as outlined in Decision #2), the Board expects that the updated drawings submitted in the revised CRP would be reflective of the Board’s decision.

Signed the 23rd Day of March, 2021, on behalf of the Wek’èezhii Land and Water Board



Witness



Joseph Mackenzie
Chair, Wek’èezhii Land and Water Board