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March 8, 2021

File: W2014L3-0002

Graeme Drew
SAO, Community Government of Behchokq
P.O. Box 68
Behchokq, NT
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sent by email

Dzë nezł Graeme and Yannick,

Re: Information Request for the Community Government of Behchokq Closure and Reclamation Plan for the Solid Waste Facility Version 2.0 (W2014L3-0002)

Version 2.0 of the Closure and Reclamation Plan (CRP) for the former/old Solid Waste Facility (SWF) was prepared by BluMetric on behalf of the Community Government of Behchokq (CGB) on November 4, 2020 with plans to permanently close the facility in 2021.¹ As per rule #61 of the Board's Rules of Procedure, an information Request is being issued to CGB/BluMetric to obtain clarity and additional information outlined below to assist the Board in its decision-making process on Version 2.0 of the CRP.

NW Poned Water Management

In the CRP, CGB/BluMetric proposes to have the NW ponded area pumped dry to remove any fallen waste material. This water is proposed to be placed in either an adjacent water body or placed in a "temporary sump within the waste mound". The ponded water was also sampled in 2019 and its results were provided in the CRP. During the public review, Board staff asked CGB to provide rationale for how sending ponded water from the Solid Waste Facility to an adjacent water body was in compliance with its Water Licence; to provide additional details on the receiving water body; and to provide contingencies/alternatives if using a sump is not an option.² 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 also committed to provide further information to the addendum to describe management of the storm water. For further clarity and additional information on the proposed management of the NW ponded area, the following information is requested below:

- 1) If a temporary sump were to be created, where would the sump be located within the waste mound? How far would the sump be from the closest water body and are there

¹ See WLWB (www.wlwb.ca) Online Registry 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 – SWF – CRP – V2.0 – Review Summary and Attachments – Feb 4 21](#)

any potential environmental concerns with this method and/or location? If so, please describe with any proposed mitigations. If none, please provide rationale.

- 2) Are there any other closure alternatives to manage the ponded water?
- 3) Board staff note that the CGB's 2019 Updated Construction and Design Drawing Report³ recommended that the NW ponded water could also be pumped into "the northern sewage lagoon." Would the lagoon still be considered as a contingency option? If so, please elaborate on how this option complies with the Water Licence and how the water quality results from the ponded water compare to the EQC for the sewage lagoon in the Licence (Part D, Conditions 2 and 3 of the Licence).
- 4) How much water needs to be pumped from the ponded area? Does this information influence what management option is recommended/contingency options are available? If so, please describe how. If not, please provide rationale.

We ask that CGB/BluMetric respond to this information request as soon as possible. Should the CGB/BluMetric have any questions, please feel free to contact me by email or by phone at (867) 765-4589.

Sincerely,



Ryan Fequet
Executive Director, Wek'èezhìi Land and Water Board

Bcc: Wek'èezhìi Distribution List

³ See WLWB Online Registry for [W2014L3-0002 – Behchoko – Solid Waste Facility – Construction Report and Design Drawings – Update – Sep 6 19](#)