

Comment Table -- Environment Canada's Comments to the NWB on Licence No. 3AM-ARV1015

#	<u>TOPIC</u>	<u>COMMENT</u>	<u>RECOMMENDATION</u>
1	Amendment Renewal Application Licence Term	The Proponent is requesting a 24 year licence which would be valid until 2039. This includes an increase in the authorized amount of water from 86,000 cubic metres to 175,000 cubic metres annually to meet the 24 year water demand of the community.	EC recommends that the Proponent request a shorter Licence term (such as 5 years) due to the compliance issues resulting in lack of information. Water allocation for the designated term should be re-calculated based on projected annual consumption in the final year of the licence.
2	Amendment Renewal Application Sublethal Toxicity Testing	The application indicates that the Proponent is requesting that the condition to conduct acute toxicity testing be removed from the licence. This request is based on difficulty in satisfying laboratory protocols of sampling and shipping large volumes of water within holding times. Alternatively, it is proposed that sampling results from monitoring stations ARV-2a, ARV-4, and ARV-2b be compared to CCME guidelines for protection of aquatic life to confirm there is no adverse impact from the solid waste site and sewage wetlands.	EC recommends that the Proponent provide recent historical monitoring data to evaluate this request.
3	Amendment Renewal Application Monitoring	Water quality and toxicity testing is required under the existing licence yet it does not appear to have been completed. Non-compliance with the existing water licence inhibits EC's ability to complete a thorough review of the amendments requested. No water quality samples or toxicity testing from the previous licence have been included in the amendment application.	EC recommends that if water quality and toxicity results are in fact available, they should be provided by the Proponent.
4	Amendment Renewal Application Water Use	The renewal application requests an increase in water use from 86,000 cubic metres to 175,000 cubic metres to meet the 24 year water demand of the community	EC recommends that the Proponent clarify whether the existing sewage lagoon system has the capacity to manage the increased volumes that are anticipated over the course of the requested licence. EC also recommends that the Proponent clarify the holding time required for meeting objectives prior to discharge, and whether these objectives would be satisfied with increased sewage without removing sludge.
5	Amendment Renewal Application Sewage System	The application indicates that if the sludge accumulates to the point that it interferes with the treatment process that it may need to be removed. The sludge management plan is included in the Sewage Treatment Facility Report. This report was not included in the application package (Only the Sewage Treatment Facility OM Plan from May 2010).	EC recommends that the Proponent clarify how sludge accumulation is monitored, and how is it determined that the sludge is interfering with the treatment process.
6	Amendment Renewal Application Solid Waste	The application summary indicates that "hazardous waste is stored next to the garage". EC had previously commented on lack of detail on how access to the hazardous waste storage area is controlled.	EC recommends that the Proponent provide information on how EC's prior comments were incorporated into practice to increase containment and reduce spills or leaching into the environment.

7	Amendment Renewal Application Solid Waste	The Proponent would like the conditions relating to the New Solid Waste Site to remain on the renewed licence, though there are no immediate plans for these facilities to be constructed. The Solid Waste Disposal Facility is nearing the end of its life and will be necessary within the 24 year period of the requested licence. The Solid Waste Management Facility OM Plan from 2010 states that "the landfill is nearing capacity and an expansion or a new site will be required in the next few years".	<p>EC recommends that the Proponent clarify for how many years the existing facility is expected to function until capacity is reached.</p> <p>EC recommends that the Proponent clarify whether an expansion was needed in the previous licence term in order to create sufficient capacity.</p> <p>EC recommends that the Proponent clarify whether closure plans have been prepared.</p>
8	Amendment Renewal Application Compliance	A number of instances of non-compliance are noted in the Compliance Plan.	<p>EC recommends that the Proponent must ensure that any effluent discharged from a system's final discharge point is in compliance with Section 36(3) of the <i>Fisheries Act</i>. According to the <i>Fisheries Act</i>, Section 36(3), the deposition of deleterious substances of any type in water frequented by fish, or in any place under any conditions where the deleterious substance, or any other deleterious substance that results from the deposit of the deleterious substance, may enter any such water, is prohibited. Additionally, we would like to highlight that there are federal wastewater regulations in force in areas outside Canada's Far North.</p> <p>EC recommends that the Proponent review and strive to attain the level of treatment described in the Wastewater Systems Effluent Regulations.</p>
9	Environmental Monitoring and QAQC Plan Sampling locations	It is noted that sampling station ARV-5 (discharge from bulky metal waste area) and ARV-6 (discharge from hazardous waste storage area) are not included on the figures.	EC recommends that the Proponent identify the location of ARV-5 and ARV-6 on the figures.
10	Environmental Monitoring and QAQC Plan Sampling locations	There are inconsistent descriptions of sampling station ARV-3 between the Environmental Monitoring Plan (sampling of effluent discharge from the Final Discharge Point of the Solid Waste Disposal Facility) and the Licence (raw sewage at truck offload point - not active) as well as ARV 6 (discharge from the hazardous waste storage area vs. sampling of effluent discharge from the FDP of wetland treatment area of the sewage disposal facilities).	EC recommends that the Proponent verify the description of ARV-3 and ARV-6, whether they are active or inactive, and their location. All plans should be amended to include the correct descriptions and locations.
11	Supporting documents	EC notes that all provided plans have not been updated since the previous renewal process.	EC recommends that the Proponent should update all Plans according to changes and improvements that may have occurred during the previous licence term.