

Response to Comments and Recommendations
 Water Licence 3BM-GRI2025
 February 2026

Supporting documentation referenced in Licensee Response accessible at: <https://app.ca.e-builder.net/public/publicLanding.aspx?QS=f830a0c5ae6249089794e1893456fd76>

Agency	Date	Page(s) No.	Comment / Recommendation ID	Licensee Response
CIRNAC	Feb-05-2026	5-6	R-01b	<p>The proposed method of using the sewage tank volume multiplied by discharge events would not accurately estimate the total volume of sewage discharge to the sewage lagoon because the sewage truck operators do not wait until the tank is full to discharge sewage depending on their schedule for efficiency and generally discharge their tank at the end of the working day to avoid holding sewage in the tank overnight for risk mitigation – freezing, breakdowns, sludge accumulation, etc.</p> <p>The updated plan for compliance has been uploaded.</p>
CIRNAC	Feb-05-2026	5-6	R-01d	<p>The amount of water used for dust suppression is insignificant compared to the total volume of water that is consumed and which ultimately ends up in the sewage lagoon as wastewater. Using water for dust suppression is an irregular practice by the municipality as the water could freeze leading to dangerous road conditions.</p> <p>The updated plan for compliance has been uploaded.</p>
CIRNAC	Feb-05-2026	7	R-02(a-c)	<p>The Licensee maintains the position that the CCME Water Quality Guidelines for the Long-Term Protection of Aquatic Life are not applicable to the vegetated wetland filter strip. It is not a freshwater habitat.</p>
CIRNAC	Feb-05-2026	8	R-03a	<p>Please see the updated Environmental Emergency Contingency Plan and Operation and Maintenance Plan for the Sewage Disposal Facilities.</p>

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CIRNAC	Feb-05-2026	9	R-03c	The bulk jet fuel, diesel, and gasoline associated with the airport and tank farm are fully managed by the owners of those facilities and is not apart of the scope of the municipal water licence, which covers the municipal water supply, sewage, and solid waste facilities.
CIRNAC	Feb-05-2026	10	R-04b	A study on the wetland treatment area for retention time has not been a regulatory requirement in the procedural history for the wastewater treatment facility, which was commissioned in 1996. The Licensee is committed to achieving the effluent quality limits as per the water licence to minimize environmental impact.
CIRNAC	Feb-05-2026	13	R-11	Please see the updated Operation & Maintenance Plan for Solid Waste Disposal Facilities, as requested which include the timelines for the solid waste upgrade project, which will improve segregation for hazardous and bulky wastes.