

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

Supporting documentation referenced in Licensee Response accessible at: <https://app.ca.e-builder.net/public/publicLanding.aspx?QS=080c769b97574157b857fd1b6c5b94b5>

| Agency | Date | Page(s) No. | Comment / Recommendation ID | Licensee Response |
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| CIRNAC | Feb-24-2026 | 4-5 | R-01 | <p>The updated plan for compliance has been uploaded. Please note the long-term plans will be to continue as is based on the short-term plans continuing.</p> <p>B-1a is listed as in compliance still as the Licensee provides all data that it generates for the Monitoring program in the Annual Reports. That said, it is not feasible to measure the wastewater disposal daily, but the daily volumes can be estimated, and the full water quality sampling program is not always completed.</p> <p>B-1b and H-2 has been kept as in compliance as the amount of fresh water obtained as part of the water supply facility is measured and the quantities provided in the Annual Report.</p> <p>B-1c, B-1e, and B-1i have been updated accordingly.</p> <p>B-1d has been kept as in compliance as any modifications and major maintenance work have been included in the Annual Reports</p> <p>D-2, F-6, F-6b and F-6c have been updated.</p> <p>H-1 and H-8 have been updated.</p> |
| CIRNAC | Feb-24-2026 | 5 | R-01b | <p>The daily quantities of wastewater disposed can be estimated and reported using the monthly quantity of wastewater as the basis for the daily average quantity of sewage disposed within each month.</p> |

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| CIRNAC | Feb-24-2026 | 7-8 | R-02a-c | <p>The vegetated filter strip is a terrestrial component of the treatment system and does not constitute a freshwater aquatic habitat. The ultimate receiving environment is the marine waters of Jones Sound.</p> <p>Available monitoring data from GRI-4 (pre-dilution and pre-wetland treatment) does not demonstrate effluent concentrations that would reasonably be expected to cause adverse effects in the marine receiving environment. When compared against CCME Water Quality Guidelines for the Protection of Aquatic Life (Marine):</p> <ul style="list-style-type: none"> • Zinc and mercury concentrations are below marine guideline values; • Iron is not present at concentrations associated with marine aquatic toxicity; and • Copper results are reported as total concentrations, whereas marine guidelines apply to dissolved fractions; values are measured prior to attenuation within the vegetated strip and prior to dilution and mixing in the marine environment. <p>Accordingly, the available data do not indicate exceedances of marine aquatic life guidelines at the point of environmental exposure, nor do they demonstrate a likelihood of adverse effect once natural attenuation and especially after marine mixing are considered.</p> <p>In the absence of demonstrated impact to the marine receiving environment, the Licensee submits that CIRNAC's recommendations are not technically warranted based on current evidence.</p> |
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