



## 2) We have noticed some issues in Amendment Letter issued June 13, 2022:

- a. there is no effluent discharge from Exfiltration Trench for Temporary Camp

Greywater from the temporary camp is collected in a holding tank before it is released into the exfiltration trench. Once in the exfiltration trench, the greywater undergoes passive treatment, whereby the water percolates slowly through the soil allowing for natural treatment. The treated water or effluent never makes its way back to the surface nor is it collected.

In this respect can the term 'Greywater exfiltration trench' be removed from the following items (the reasoning is explained for each item).

- Part D: Amended item 14 – there will be no effluent discharge from greywater exfiltration trench
- Part I: Amended Item 1 – there will be no effluent discharge to monitor at the greywater exfiltration trench, so request to remove it from sample analysis/monitoring requirements at EUR-9. ECCC can monitor the quantity in cubic metres of sludge removed from the greywater exfiltration trench
- Part I: Amended Item 4 – there will be no effluent discharge from the greywater exfiltration trench
- Part I: Amended Item 5 – there will be no release of effluent from the greywater exfiltration trench
- Part I: Amended item 6 – no discharge will be produced from the greywater exfiltration trench

If there is no effluent discharge, no monitoring for effluent quality is required. Recognizing logistical challenges and tight construction schedules, the Board did not include groundwater monitoring for the trench exfiltrate into this Licence.

- b. Updated Summary of Operations and Maintenance Procedures for Drinking Water, Sewage, Solid Waste Disposal and Waste Treatment Facilities (June 2021)

Instead of submitting an updated version of the Summary of Operations and Maintenance Procedures Document (June 2021) 30 days prior to commissioning of the exfiltration trench, can ECCC proceed with construction of the exfiltration trench and submit the updated document alternatively within 30 days of completion of construction, post-commissioning? Given the objective of building the exfiltration trench is to help minimize the concentrations of parameters discharged at EUR-3, our priority was to start building the exfiltration trench on June 20, 2022 and have it operational soon after in time for the field season. The Board routinely includes requirements for submission of management plans and operation and maintenance manuals ahead of commissioning of respective facilities in order to conduct proper review. Hence, the corresponding condition in the Licence for this project. While the Board included this condition, the Board is not the enforcing agency. CIRNA Water Resources, via the Inspector, enforces the conditions of the Licence.

Best regards,

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