

**From:** [Miki Ehrlich](#)  
**To:** ["Permits"](#)  
**Subject:** FW: City of Yellowknife - Plan Submission Dates Modifications, AANDC-WRD Comments  
**Date:** Thursday, February 02, 2012 10:02:46 AM  
**Attachments:** [YELLOWKN-#499672-v1-RC - WL - YELLOWKNIFE \(DATES CHANGE\) \(C OF\) MV2009L3-0007 \(COVER LETTER\) - 2012 01 30.DOC](#)  
[YELLOWKN-#499434-v2-RC - WL - YELLOWKNIFE \(DATES CHANGE\) MV2009L3-0007 \(COM T\) - 2012 01 30.XLSX](#)

---

Please post to MV2009L3-0007 – Management Plans – Assorted Management Plans

Thanks!

Miki

---

**From:** Jeanne Arsenault [mailto:[Jeanne.Arsenault@aandc-aadnc.gc.ca](mailto:Jeanne.Arsenault@aandc-aadnc.gc.ca)]  
**Sent:** Wednesday, January 25, 2012 2:20 PM  
**To:** Miki Ehrlich  
**Subject:** City of Yellowknife - Plan Submission Dates Modifications, AANDC-WRD Comments

Hi Miki;

Please find attached comments for the City of Yellowknife Plan Submission Date Modification - MV2009L3-0007.

If you have any questions, do not hesitate to contact me. Have a great week back at work -

Jeanne

Jeanne Arsenault  
Pollution Control Specialist  
Renewable Resources and Environment  
Water Resources Division  
Aboriginal Affairs and Northern Development Canada  
3rd Floor, Bellanca Building  
P.O. Box 1500  
Yellowknife, NT, X1A 2R3

Phone: 867-669-2658

Fax : 867-669-2716

E-mail: [Jeanne.Arsenault@aandc.gc.ca](mailto:Jeanne.Arsenault@aandc.gc.ca)



File: W2009L3-0007

January 30th, 2012

**To:** Miki Ehrlich  
Regulatory Officer  
Mackenzie Valley Land and Water Board  
7th Floor - 4910 50<sup>th</sup> Avenue  
Box 2130  
Yellowknife, NT X1A 2P6

Fax: 867-873-6610

**Re: MV2009L3-0007 - Plan Submission Date Modification request – City of Yellowknife, January 2012.**

Aboriginal Affairs and Northern Development Canada – Water Resources Division (AANDC) has reviewed the City of Yellowknife Plan Submission Date Modification request. AANDC provides the attached comments, in the Comment Table format, as requested by the Mackenzie Valley Land and Water Board.

Thank you for providing AANDC with the opportunity to comment on the above application. If you have any questions or concerns, please feel free to contact Ms. Jeanne Arsenault at 669-2658 or [Jeanne.Arsenault@aandc-aadnc.gc.ca](mailto:Jeanne.Arsenault@aandc-aadnc.gc.ca), or Mr. Michael Martin at 669-2764, or [Michael.Martin@aandc-aadnc.gc.ca](mailto:Michael.Martin@aandc-aadnc.gc.ca) .

Sincerely,

Robert Jenkins  
Manager  
Water Resources Division  
Aboriginal Affairs and Northern Development Canada  
NWT Region

<p><b><u>GENERAL INSTRUCTIONS FOR EXCEL TEMPLATE:</u></b></p> <ol style="list-style-type: none"> <li>1. Do not leave blank rows above or between comments.</li> <li>2. Do not modify or delete the instructions or the column headings (<i>i.e.</i> the grey areas).</li> <li>3. Each comment must have an associated topic and recommendation.</li> <li>4. All formatting (<i>i.e.</i> bullets) will be lost when this file is uploaded to the Online Comment Table.</li> <li>5. If necessary, adjust the cell width and height in order to view all text.</li> <li>6. Cutting and pasting comments from WORD documents cannot include hard returns (spaces between paragraphs).</li> <li>7. If you would like to create paragraphs within a single cell, please use a proper carriage return (ALT &amp; ENTER).</li> </ol>		<p><b>App #: MV2009L3-0007</b></p> <p><b>Review of: Plan Submission Date Modification request, City of Yellowknife</b></p> <p><b>Reviewing Agency: Aboriginal Affairs and Northern Development Canada</b></p> <p><b>Date: January 30th, 2012</b></p>
<p><b><u>TOPIC</u></b></p> <p><i>Be as specific as you think is appropriate; for example a section or page of the document, a recommendation #, general comment, etc.</i></p>	<p><b><u>COMMENT</u></b></p> <p><i>Comments should contain all the information needed for the proponent and the Board to understand the rationale for the accompanying recommendation.</i></p>	<p><b><u>RECOMMENDATION</u></b></p> <p><i>Recommendations can be for the proponent or for the Board. Recommendations should be as specific as possible, relating the issues raised in the "comment" column to an action that you believe is necessary.</i></p>
<p>General Comments - Extension Requests</p>	<p>Before commenting on the extension request, AANDC would like to first highlight its concerns with the 2011 sampling season and the original water licence submission dates.</p> <p>AANDC notes that the City of Yellowknife completed a water licence renewal process in 2010, with a renewed water licence granted on May 31st, 2010. During the renewal process, there were some discussion on the performance of the sewage treatment system and general O&amp;M requirements for the sewage and solid waste disposal areas. As such, a number of plans and reports were required by the MVLWB with submission dates for late 2011 and spring 2012. This would infer that sampling and data collection activity were needed in 2011. It appears from the City of Yellowknife's submission that these studies did not occur in 2011. There is no rationale for why the City did not conduct these studies or at the very least complete some of the required sampling and reporting requirements.</p>	<p>AANDC is not clear why sampling and report writing did not occur in 2011, as this would have been required in order to fulfil the requirements of the water licence. The reports were to be prepared and submitted by the City in spring 2012. This is especially concerning given the recent renewal process and the concerns brought forward regarding the performance and maintenance requirements of the Waste Disposal Facilities.</p> <p>Regarding the extension of the various deadlines AANDC offers the following recommendations below.</p>

<p>Revised submission dates - Fiddler's Lake Treatment System (D.15), Lagoon Report (D.19), Sewage Effluent Characterization Study (D.20).</p>	<p>These three submissions were requirements of the City of Yellowknife water licence in order to better understand current municipal wastewater effluent, the Fiddler's Lakes treatment system and the facilities operation and maintenance requirements. In January 2012, the City of Yellowknife requested an extension to D.15 (Oct. 31, 2012), D.19 (May 31, 2012) and D.20 (Oct. 31, 2012).</p>	<p>As sampling did not occur in 2011, AANDC understands that more time is required for the analysis of sampling data required for these studies in 2012. AANDC does not object to these extensions as no data is available to complete these reports at this time.</p>
<p>Revised submission date - Sewage disposal Facilities O&amp;M Plan (H.1)</p>	<p>AANDC notes that the purpose of the Operation &amp; Maintenance (O&amp;M) plan is to provide specific procedures and information on everyday operation and maintenance tasks relating to the treatment and release of municipal wastewater &amp; sewage. Yellowknife municipal wastewater effluent circulates through the Fiddler's treatment system composed of 13 km of natural lakes and wetland areas (before entering Great Slave Lake). It is recommended that requirement H.1 for Sewage Disposal Facility Operations and Maintenance plan remain as initially planned, so the necessary information and procedures be available to staff to allow for best management practices. If and when additional information and results become available in the future, the proponent can simply update the O&amp;M plan as per requirement H.3 of its water licence. The City can request changes in operations, maintenance or treatment technology based on the results from research or other studies (once available) in any annual plan submissions.</p>	<p>AANDC recommends that the submission date for the Sewage Disposal Facility Operations and Maintenance Plan remain unchanged (May 31, 2012).</p>

<p>Revised submission date - Study on discharge area for treated water from Bio Pad (D.22).</p>	<p>The City of Yellowknife requested a 1 year extension for submission D.22 (March 31, 2013). Requirement D.22 of the water licence read as followed, "... a study of the capabilities of the effluent discharge area for the Biotreatment Pad of the Solid Waste Disposal Facility to absorb water. This study and report shall consider discharge volume and seasonal timing of discharge." AANDC notes that the recently submitted Biotreatment Pad O&amp;M plan did not appear to provide information regarding the treatment process used to treat contaminated soil leachate, leachate treatment procedures, contingency measures in the event leachate samples prohibited disposal or the disposal locations currently used/proposed. A recent e-mail from Biogénie (October 2011), also reported results for Chemical Oxygen Demand (COD) at values persistently over the acceptable limits, which did not allow for disposal until late in the fall 2011. This limited the ability to create storage within the Biotreatment Pad lagoon for melt water in spring 2012.</p>	<p>AANDC considers the Biotreatment Pad operations and procedures to be very important and therefore recommends that requirement D.22 of the water licence for the treated leachate effluent discharge study be November 31st, 2012 (after the 2012 summer field work season).</p>
<p>Requirement D.14 of water licence - Solid Waste Disposal facility, Drainage Study revision</p>	<p>Requirement D.14 of the water licence requested the submission of a revised solid waste disposal facilities drainage study 18 months following issuance of the water licence, therefore by November 31st, 2011. It is unclear if this item was submitted as it did not appear to be available on the City's water licence webpage of the MVLWB website.</p>	<p>It should be clarified whether or not requirement D.14 of the water licence was submitted to the Board. If not submitted, the proponent should provide a date by which this submission will occur.</p>
<p>Revised submission date - Background metal concentration study at the Solid Waste Facility (D.23)</p>	<p>The City of Yellowknife is currently looking for any data on metal concentrations in the area to determine the extent and requirements of the study. The work required to complete this study is currently scheduled for the summer of 2013. AANDC notes that this work was to originally occur in the summer of 2012.</p>	<p>AANDC does not object to an extension; but would recommend an earlier submission date of November 31st, 2013.</p>