

Reviewer Comments and Proponent Responses

Project: Behdzi Ahda First Nations Band
Board: Sahtu Land and Water Board
Organization: Behdzi Ahda First Nation Band

No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response
Fisheries and Oceans Canada (DFO) - Ms. Anna-Maija LaFlamme				
1	Behdzi Ahda First Nations Band: Municipal Water Licence Cover Letter, Table of contents, Application.	The project documents reports significant water intake from the water treatment plant. The water intake rate is above DFO's Interim code of practice: end-of-pipe fish protection screens. DFO suggests to the proponent to consider applying a fish protective screen to the intake to avoid the entrainment or impingement of fish.	Based on the information that was submitted, DFO recommends the proponent to apply an appropriately sized fish screen to the end of the intake pipe in accordance with DFO Interim code of practice: End-of-pipe fish protection screens for small water intakes in freshwater (dfo-mpo.gc.ca) In order to comply with the Fisheries Act, it is recommended that the Proponent follow DFO's protective measures for fish and fish habitat and standard codes of practice which can be found on DFO's website (https://www.dfo-mpo.gc.ca/pnw-ppe/measure-mesures-eng.html and https://www.dfo-mpo.gc.ca/pnw-ppe/practice-practique-eng.html).	A pump intake end-of-pipe fish screen was included in the original design and installed for the raw water pump at the time of original construction 2006-2007. It is currently in place. Attachment 1 provides details (Designed by Dillon Consulting for GNWT Public Works and Services).

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GNWT - Environment and Climate Change - Environmental Regulatory Analyst				
1	GNWT-ECC Cover Letter	Please see attached.	N/A	Cover letter acknowledged.
2	Population	The current community population listed on page 1 of the Questionnaire is 169 people. This number is also used as the current population in Section 7 of the Solid Waste Disposal Facilities (SWDF) Operation and Maintenance Plan (OMP). Based on the Northwest Territories Bureau of Statistics link provided in both documents, the projected population for 2025 is 153 people (using the year 2025 because the current year is not provided and 2025 is the closest year). It is unclear whether Behdzi Ahda First Nation (BAFN) has information from an alternative source to suggest that the current population is 169 people. Additionally, the Questionnaire indicates that the projected population in 2025 will be 178 people. It is noted that this may be a typo, as a population of 178 is projected for the year 2035, not 2025.	The Government of the Northwest Territories (GNWT) Department of Environment and Climate Change (ECC) recommends that BAFN provide rationale for the statement that the current population is 169 people, and that the projected population for 2025 is 178 people.	The existing population of 169 for 2023 was provided by BAFN Administration. The projection number for Year 5+ (Questionnaire) is fewer than current; therefore, 178 was chosen as the closest reasonable projection greater than current. You are correct, the projected population of 178 is for 2035 and the Questionnaire will be corrected. Section 7.0 SWDF O&M template calls for the projected population 10 years from now which correlates to the 178 in 2035 (closest to 10 years); no changes are needed.
3	Landfill Wells	The "Facility Condition" section of the Questionnaire indicates that the Surveillance Network Program wells at the landfill may need repair. However, there are no mentions in the "Upgrades" section or elsewhere in the Questionnaire of plans to repair the wells at the landfill.	GNWT-ECC recommends that BAFN clarify whether there are plans to repair the wells at the landfill.	It is BAFN's understanding that the responsibility for the SWDF Surveillance Network Program wells resides with GNWT-ECC Contaminants Division.

4	Solid Waste Disposal Facilities Visits	Section 4 of the SWDF OMP asks how often staff visit the SWDF if there is no designated site operator. GNWT-ECC notes that this has been left blank.	GNWT-ECC recommends that BAFN clarify whether staff visit the SWDF and how often these visits occur.	BAFN Staff visit the Solid Waste Disposal Facility and Sewage Disposal Facility biweekly (every 2 weeks).
5	Solid Waste Quantities	While annual report requirements will be finalized in the water licence, Section 15 of the SWDF OMP indicates that a summary of monthly and annual quantities of solid waste should be included in the annual report. The questions in Section 15 regarding how and where quantities of solid waste are recorded have been left blank. It is important that there is a method to track solid waste quantities. GNWT-ECC notes that a number of small communities use a formula provided by GNWT Municipal and Community Affairs (MACA) to estimate the quantity of solid waste based on the population.	GNWT-ECC recommends that BAFN determine a feasible method to track monthly and annual quantities of solid waste and that these quantities be reported in the annual report.	We appreciate the recommendation and will use the MACA estimation formula referenced.
6	Sewage Disposal Facilities - Proposed Wells	Section 14 of the Sewage Disposal Facilities (SDF) OMP outlines three proposed wells for the Surveillance Monitoring Program. GNWT-ECC notes that it is unclear how the locations for these proposed wells were selected.	GNWT-ECC recommends that BAFN provide rationale for the proposed locations of the SDF wells.	A half-circle of 3 wells were sited in the area downgradient of the discharge area, between the southern edge of the natural pond and the roadway. The intention was to intersect the expected flow direction.
7	Training	Section 2.13 of the Spill Contingency Plan (SCP) includes a table to indicate which types of training are required for those working at each facility. GNWT-ECC notes that this table is not filled out.	GNWT-ECC recommends that BAFN complete the training table in Section 2.13 of the SCP.	All 6 training items in Section 2.13 of the BAFN SCP will be included for WTP, SDF and SWDF planning, training, and documentation. The Bulk Fuel Storage Facility is not included in the BAFN scope because that Facility is the responsibility of GNWT-Infrastructure. It is expected that GNWT-Infrastructure would have a SCP in place and will include some community members, as first responders, in training.
8	Draft Licence	The Item Description on the Online Review System indicates that a draft licence was to be posted to the review by December 14th, 2023. GNWT-ECC notes that a draft licence was not posted to the review.	GNWT-ECC recommends that a draft licence be circulated for review once BAFN has had an opportunity to respond to comments on this review of the application materials.	This comment is directed to the SLWB.

No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response
Environment and Climate Change Canada (ECCC) - Mrs. Stephinie Mallon				
1	ECCC Cover Letter	ECCC Cover Letter	N/A	Cover letter acknowledged.
2	Topic: Species at Risk References: -Behdzi Ahd a First Nation, Municipal Water Licence Application, Colville Lake -Operation and Maintenance Plan Templates for Municipal Water Licences: Solid Waste Disposal Facility, Colville Lake	Species at risk are assessed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) or added to Schedule 1 of the Species at Risk Act (SARA) on a regular basis. It is important for Proponents to ensure they are aware of what species are present in the project area and take appropriate actions to ensure compliance with the SARA. The killing, harming or harassing of listed species as well as the damage and destruction of their residences is prohibited under SARA. In the territories, the prohibitions apply automatically to: • Threatened, Endangered and Extirpated species listed on Schedule 1 of SARA on lands under the	As species are assessed and listed on a regular basis, ECCC recommends the Proponent: a) Consult the Species at Risk registry to obtain the most current information for their operations. b) Consult the Government of the Northwest Territories to identify appropriate mitigation and/or monitoring measures to avoid and lessen project effects to species under their management responsibility. For more information on Species at Risk in the Northwest Territories, please refer to the booklet 'Species at Risk in the Northwest Territories (2020 edition).'	All parts of the WL Application were complete. Daily activities utilize existing roads and facilities and are unlikely to kill, harm, or harass any animals including Species at Risk. Construction of the new WTP will contemplate the possibility of SAR interactions and include plans to lessen or mitigate the effects of construction.

		<p>authority of the federal Minister of Environment.</p> <ul style="list-style-type: none"> • Migratory Birds (as defined under the Migratory Birds Convention Act [MBCA]) everywhere they are found. <p>These prohibitions can apply elsewhere if there is an order put in place.</p> <p>The destruction of critical habitat of species listed under Schedule 1 of SARA is prohibited on all lands identified within the critical habitat protection order for the species.</p>		
3	<p>Topic: Species at Risk – Missing Items References: -Behdzi Ahda First Nation, Municipal Water Licence Application, Colville Lake -Operation and Maintenance Plan Templates for Municipal Water Licences: Solid Waste Disposal Facility, Colville Lake</p>	<p>Section 79 of SARA requires the assessor and decision body to ensure that where a project is likely to affect a listed species or its critical habitat, all adverse effects of the project are identified and considered in the assessment of the project. Appropriate measures must be taken to avoid or lessen those effects and include monitoring. Measures should be consistent with applicable recovery documents.</p> <p>Section 79 applies to all listed species on Schedule 1 of SARA including those listed as Special Concern, Threatened, Endangered and Extirpated. As a matter of best practice, COSEWIC-assessed species should be assessed similarly to those listed under SARA.</p> <p>The Proponent has not identified any species at risk that are likely to be present in the Project area, including Boreal Caribou, for which the Project falls within their critical habitat. The Government of the Northwest Territories, in general, hold the best available information and technical knowledge for this species. ECCC defers to the Government of the Northwest Territories for specific mitigation and monitoring recommendations.</p> <p>Table 1 in Appendix A contains a list of species that are likely to be encountered in the Project area that have been assessed as at risk by COSEWIC or listed on Schedule 1 of SARA.</p> <p>The Project may have adverse effects on listed species including direct habitat loss, impacts due to noise and wildlife injury or mortality.</p>	<p>ECCC recommends the Proponent:</p> <ol style="list-style-type: none"> Identify adverse effects of the Project on the species at risk likely to be affected and their critical habitat; Ensure that measures are taken to avoid or lessen those adverse effects and monitor them to inform adaptive management. <p>If the Proponent encounters species at risk, the primary mitigation measure should be avoidance. ECCC recommends:</p> <ol style="list-style-type: none"> Mitigation and monitoring measures be consistent with applicable species at risk Recovery Strategies and Action Plans or Management Plans. At a minimum, monitoring should include recording timing and location of observed species at risk, their behavior when encountered, and actions taken by the Proponent to avoid disturbance to the species, its habitat, and/or its residence. The Proponent submit monitoring reports to the appropriate regulators and organizations with management responsibility for that species. 	<p>Facility areas and all season roads have already been constructed; activities of every day living will not create new disturbance or disruption. Activities outside the community are not expected during the permit period.</p>
4	<p>Topic: Project Activities References: -Behdzi Ahda First Nation, Municipal Water Licence Application, Colville</p>	<p>The Migratory Birds Regulations (MBR) prohibit the disturbance or destruction of migratory birds and their nests or eggs. The project occurs during the nesting season for migratory birds which extends from early May to late August for this region. Migratory birds, their nests and their eggs can</p>	<p>ECCC recommends the Proponent carry out all phases of the project in a manner that reduces risk to migratory birds and to avoid harming, killing or disturbing migratory birds or destroying, disturbing or taking their nests and eggs.</p>	<p>WTP, SWDF, SDF are existing features with no new disturbance anticipated for the majority of the permit period. Planning and construction of the new Water Treatment Plant within the community on previously disturbed land, will require Contractors, in consultation</p>

	<p>Lake -Operation and Maintenance Plan Templates for Municipal Water Licences: Solid Waste Disposal Facility, Colville Lake</p>	<p>be inadvertently harmed, killed, disturbed or destroyed because of many activities including, but not limited to, clearing of trees and other vegetation, draining or flooding land, or using fishing gear. Harming of individual birds, nests or eggs, can have long-term consequences for migratory bird populations in Canada, especially through the cumulative effects of many different incidences.</p>	<p>Proponents should not conduct potentially destructive or disruptive activities at key locations or during key periods to avoid negative impacts to migratory birds. In this regard, the Proponent should take into account ECCC's Guidelines to Avoid Harm to Migratory Birds and visit Fact Sheet Nest Protection Under the Migratory Birds Regulations, 2022 and Frequently Asked Question, Migratory Birds Regulations, 2022 for more information on the amended Migratory Bird Regulations and updates to nest protections.</p>	<p>with BAFN, to respond to comment requirements.</p>
5	<p>Topic: Project Activities (Clearing) References: - Behdzi Ahd a First Nation, Municipal Water Licence Application, Colville Lake -Operation and Maintenance Plan Templates for Municipal Water Licences: Solid Waste Disposal Facility, Colville Lake</p>	<p>The Proponent indicates that habitat alteration and/or disturbance may be required during the general nesting period as part of project activities.</p> <p>The Project is located in Nesting Zone B8. In this area, migratory birds may be found nesting from early May to late August. During this period, clearing or brushing of vegetation or activities that may disturb or alter nesting habitat may increase the risk of destruction of the nests and eggs of migratory birds. It is important to note that nesting periods may vary from year to year due to climatic conditions and some species may nest outside the dates provided if conditions are favourable.</p> <p>If there are occupied migratory bird nests where work is planned, activities that could disturb or destroy nests should be avoided, adapted, rescheduled or relocated. The best way to avoid disturbing or destroying active nests is to avoid conducting harmful activities during the breeding season.</p> <p>Determining the presence of nesting migratory birds may help reduce risks, but active nest searches are not recommended as the ability to detect nests is very low while the risk of disturbing and/or damaging active nests is high. As detailed in ECCC's Guidelines to Avoid Harm to Migratory Birds, nest surveys to determine nest occupancy may only be appropriate when all these conditions are met:</p> <ul style="list-style-type: none"> • Conducted by skilled and experienced observers; • Using appropriate methodology; • Only a few nesting spots or a small community of migratory birds is expected; and • The activities will take place in simple habitats. <p>Proponents are reminded that migratory bird species may nest on the ground, in ground cavities, in grasses, shrubs, cliffs, trees, tree cavities and other sites and that nest sites are often cryptic or camouflaged, making them difficult to locate.</p>	<p>ECCC recommends the Proponent avoid habitat disturbance during the general nesting period, which extends from early May to late August for this region. The Proponent must consider options such as avoiding, adapting, rescheduling or relocating activities. If a nest containing a migratory bird or egg is discovered/disturbed, the Proponent must: a) Halt all disruptive activities in the nesting area until nesting is complete and the young have fledged; and b) Establish a protective buffer zone around the nests. The buffer zone must be determined by a setback distance appropriate for the species, the intensity of the disturbance, and the surrounding habitat until the young have naturally and permanently left the vicinity of the nest. Proponents are encouraged to follow the guidance on ECCC's Guidelines to Avoid Harm to Migratory Birds. For further questions or technical information, please contact ECCC (cwsnorth-scfnorth@ec.gc.ca).</p>	<p>Clearing or active construction is not anticipated for the majority of the permit period. Please see Comment 4 for a description of construction related activities.</p> <p>Due to the limited weather window for the new Water Treatment Plant construction and commissioning, spring and summer activities may take place during the nesting period. Contractors, in consultation with BAFN, will provide detailed plans for the identification and protection of ground nests.</p>
6	<p>Topic: Bank</p>	<p>The Project falls within the breed</p>	<p>ECCC recommends the Proponent</p>	<p>WTP, SWDF, SDF are existing fea</p>

	<p>Swallow Habitat Reference: -Behdzi Ahda First Nation, Municipal Water Licence Application, Colville Lake -Operation and Maintenance Plan Templates for Municipal Water Licence: Solid Waste Disposal Facility, Colville Lake</p>	<p>ing range of the Bank Swallow and may affect important habitat features for the species. The Bank Swallow, listed as Threatened under SARA, is a colonial species that nests in burrows dug into near vertical faces of exposed sand or soil. They also nest in aggregate pits, construction and/or mine sites on stockpiles of quarry materials, overburden, and exposed soil banks. The Bank Swallow exhibits high nest site fidelity and will reuse nesting sites and burrows. The residence description for the Bank Swallow is available on the SARA registry here: https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/residence-descriptions/bank-swallow.html. Excavation, construction activities and application of erosion control measures in these areas during the nesting period can inadvertently kill or disturb Bank Swallows, destroy their residence or critical habitat, and may also affect other migratory bird species.</p>	<p>t: a) Take precautions to avoid disturbance to nesting Bank Swallows; b) Ensure staff and contractors are made aware of potential presence and conservation status of the Bank Swallow; and c) Take particular care in selecting erosion prevention and control measures and implement those measures prior to the nesting season. Proponents are encouraged to consult the linked pamphlet and contact ECCC (cwsnorth-scfno@ec.gc.ca) for further advice.</p>	<p>Bank Swallows have not been observed in the current facilities; wild birds keep their distance from the community. They have been observed to nest on mossy areas on the islands within Colville Lake several kilometres away. Community members respect those nests and do not disturb them.</p>
7	<p>Topic: Demolition and Repairs Reference: -Behdzi Ahda First Nation, Municipal Water Licence Application, Colville Lake -Operation and Maintenance Plan Templates for Municipal Water Licences: Solid Waste Disposal Facility, Colville Lake</p>	<p>Project activities include demolition work on human made structures (which may include bridges, culverts and buildings).</p> <p>Migratory birds, including Barn and Cliff Swallow may be found nesting on or in human made structures including buildings, under bridges and in culverts.</p> <p>Activities such as cleaning, application and removal of protective coatings (e.g. paints), construction, demolition, or reclamation pose a risk to nesting birds, their nests and eggs.</p>	<p>ECCC recommends the Proponent avoid demolition, maintenance or other work on existing infrastructure where migratory birds may be found nesting during the nesting period. If maintenance or demolition activities must take place during the nesting period, the Proponent should: a) Temporarily install netting and/or other appropriate deterrence systems prior to the arrival of birds in the spring to prevent nesting on man-made infrastructure; or b) Conduct nest surveys of the structures using appropriate methodology, and skilled and experienced observers. Proponents are encouraged to contact ECCC (cwsnorth-scfno@ec.gc.ca) for further advice.</p>	<p>Migratory birds are not observed in the current facilities; wild birds keep their distance from the community. They do not nest in the community. The only future demolition work is expected at the existing WTP which will be replaced with a new facility. The existing footprint is expected to be the same, as the raw water intake pump house (drawing water from Colville Lake) will be kept and reused. Demolition activities will require Contractors, in consultation with BAFN, to respond to comment requirements in their plans and implementation.</p>
8	<p>Topic: Contamination of Water Bodies Reference: -Behdzi Ahda First Nation, Municipal Water Licence Application, Colville Lake -Operation and Maintenance Plan Templates for Municipal Water Licence: Solid Waste Disposal Facility, Colville Lake</p>	<p>Fuel and/or other hazardous materials (such as sodium hypochlorite) may be stored, handled or transported near a water body that may be used by birds.</p> <p>ECCC advises the Proponent that section 5.1 of the Migratory Birds Convention Act prohibits persons from depositing substances harmful to migratory birds in waters or areas frequented by migratory birds or in a place from which the substance may enter such waters or such an area.</p>	<p>ECCC recommends the Proponent ensure their employees and contractors are made aware of plans and commitments related to storing, handling and transporting of petroleum products and other hazardous substances (such as sodium hypochlorite) and take all necessary precautions to prevent spills.</p>	<p>Agreed, recommendations will be included in operating procedures, Spill Contingency Plan and in training.</p>
9	<p>Topic: Spills Reference: -Operation and Maintenance Plan Templates for Municipal Water Licences: Solid Waste Disposal Facility, Colville Lake</p>	<p>Section 2.9 of the Spill Contingency Plan indicates that up to 380 L (20 pails) of sodium hypochlorite will be stored within the water treatment plant (WTP) storage and treatment rooms. The Proponent did not provide any detail in the Spill Contingency Plan nor in</p>	<p>ECCC recommends that the Proponent add additional details with in the Spill Contingency Plan and the Water Treatment Plant Operation and Maintenance Plan regarding:</p> <p>a) Measures that are / will be in place to minimize the possibility</p>	<p>Agreed. Recommendations will be added to the SCP and the current operating procedures for proper storage and containment for sodium hypochlorite. Safe transfer of sodium hypochlorite will be included in the SCP and current water treatment procedures. The</p>

	<p>ces: Spill Contingency Plan, Colville Lake -Operation and Maintenance Plan Templates for Municipal Water Licences: Water Treatment Plant, Colville Lake</p>	<p>Section 10 of the Water Treatment Plant Operation and Maintenance Plan, regarding measures or practices that are / will be put in place to minimize potential spills of sodium hypochlorite during:</p> <ul style="list-style-type: none"> -Storage within the storage and treatment rooms (e.g., containment of leaks through use of berms). -Transfer from the storage area to the water truck. 	<p>spills or leaks within the storage and treatment rooms of the water treatment plant; and</p> <p>b) Measures that are / will be taken to minimize potential for spills when transferring sodium hypochlorite from storage into the water truck.</p>	<p>O&M Plan for the new WTP will also include these recommendations.</p>
10	<p>Topic: Vehicle Inspection and Maintenance References: -Operation and Maintenance Plan Templates for Municipal Water Licences: Spill Contingency Plan, Colville Lake</p>	<p>The community relies on vehicles for movement of chlorinated water, sewage, and fuel. As such, accidents and malfunctions related to these trucks could result in leaks of fuel and oil, as well as spills of the transported materials (these are listed within the worst-case scenarios for fuel and sewage within Section 2.11). Accidents and malfunctions related both to the vehicle drivetrain (e.g., tires, brakes, engine, etc.) and the cargo tank (e.g., leaks) could result in leaks or spills. An inspection and maintenance plan for community-owned vehicles involved in the transportation of chlorinated water, sewage, and fuel, would help minimize the risk of leaks or spills due to vehicle accidents and malfunctions.</p>	<p>ECCC recommends that the Proponent develop an inspection and maintenance plan for community-owned vehicles that are used for carrying chlorinated water, sewage, and fuel. The inspection and maintenance plan should include both the drivetrain of the vehicle, as well as the storage tank used to transport the vehicle's cargo.</p>	<p>Community-owned vehicles are inspected and maintained by the Community Garage Foreman. This includes preventative or scheduled maintenance, repairs, oil changes and transmission inspection and maintenance. The Community Garage has proper collection and storage of spent products with secondary containment. Disinfectant water trucked to homes contains a very small amount of sodium hypochlorite recommended by GNWT - Municipal and Community Affairs for in-home system piping and tank disinfection. The concentration is intended for human consumption. Walk-around inspections for both Water trucks and Sewage transport trucks are part of loading and delivery activities with action where repair is needed.</p>
11	<p>Topic: Solid Waste Management References: -Operation and Maintenance Plan Templates for Municipal Water Licences: Solid Waste Disposal Facility, Colville Lake -Solid Waste Management for Northern and Remote Communities</p>	<p>ECCC developed the Solid Waste Management for Northern and Remote Communities, Planning and Technical Guidance Document (available at: http://www.ec.gc.ca/gdd-mw/default.asp?lang=En&n=97182135-1) to support solid waste management in northern and remote communities. The community is encouraged to consult this document.</p>	<p>ECCC recommends that the Proponent consult the ECCC planning and technical guidance document, Solid Waste Management for Northern and Remote Communities, to support responsible solid waste management and inform the Solid Waste Disposal Facility Operation and Maintenance Plan.</p> <p>A summary and a link to the full document are available on Environment and Climate Change Canada's website at the previously-stated link.</p>	<p>Understood. Thank you for the reference document citation.</p>
12	<p>Topic: Solid Waste Disposal Facility References: -Operation and Maintenance Plan Templates for Municipal Water Licences: Solid Waste Disposal Facility, Colville Lake</p>	<p>It is important to minimize site water (i.e., contact water) at the Solid Waste Disposal Facility (SWDF), as contact water can result in leaching and offsite transport of contaminants. However, based on Section 14 (Surface Water Management) of the Operation and Maintenance Plan, it appears that the SWDF does not incorporate surface water management features.</p>	<p>ECCC recommends diverting precipitation from the Solid Waste Disposal Facility in order to reduce offsite transport of contaminants.</p>	<p>Direct observation of surface precipitation flow path is from the road area (high point) split to the north and south. The area to the north is a natural low. The southern precipitation path is around the landfill area. BAFN will consider this comment in future construction or closure activities.</p>
13	<p>Topic: Sewage Effluent Monitoring References: -Operation and Maintenance Plan Templates for</p>	<p>Based on the Sewage Disposal Facilities Operation and Maintenance Plan, it appears that the effluent quality of the sewage treatment system is not being monitored. It is important to monitor effluent quality to ensure discharge criteria are met and to track tr</p>	<p>ECCC recommends the Proponent:</p> <p>a) Monitor sewage effluent quality seasonally/periodically and compare monitoring results to discharge criteria, lagoon performan</p>	<p>The size of the sewage lagoon greatly exceeds the sewage output of this small community.</p> <p>There have not been any sewage lagoon effluent discharges or discharge periods. Effluent discharge is not expected due to very low</p>

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Water Licen
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olville Lake

reatment performance of the syst
em. It is also important to record
the dates when effluent is discha
rged from the system. Although
effluent discharge is described as
continuous, it is noted that the
lagoon provides more capacity t
han is currently required and ap
pears to discharge infrequently.
The actual discharge periods sho
uld be recorded to support comp
liance monitoring.

ce design criteria, and previous
monitoring results;
b) Use effluent quality monitorin
g results and data comparisons t
o (1) verify that effluent quality i
s appropriate for discharge to th
e receiving environment, (2) trac
k sewage treatment performanc
e over time, and (3) inform sewa
ge treatment and effluent mana
gement decisions; and
c) Record start and end dates of
effluent discharge periods.

sewage volumes produced relati
ve to the lagoon size. The sewage
e volume delivered covers a very
small portion of the lagoon base;
there is surface evaporation. Ple
ase see SDF OMP PDF page 16 of
23, Additional Information, Quest
ion 10. for a description of the ve
ry low permeability barrier (geos
ynthetic liner). Occasionally with
snowmelt, the volume of sewage
plus melt water can cover some
what larger portions the base; ho
wever, not the entire base. There
is no liquid effluent or effluent sl
urry to pump or gravity discharg
e.

A Surveillance Monitoring Progra
m has been proposed downgradi
ent of the wetland area.