



INDEPENDENT ENVIRONMENTAL MONITORING AGENCY

P.O. Box 1192, Yellowknife, NT X1A 2N8 ■ Phone (867) 669-9141 ■ Fax (867) 669-9145

Website: www.monitoringagency.net ■ Email: monitor1@yk.com

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Ryan Fequet
Chair, Plan Review Process and Guidelines Working Group
c/o Wek'èezhii Land and Water Board
1 - 4905 48 St.
Yellowknife NT X1A 3S3

Re: Agency Comments on the Draft Guidelines for Waste Management

Dear Mr. Fequet

Thank you for the opportunity to offer comments on the draft version of the Guidelines for Waste Management. Generally, this is a good start at developing guidance for both proponents and reviewers. Some of the subject areas could be expanded and there is additional material that could be referenced such as guidelines or best practices developed by other government agencies that would make the document more helpful. The document title might be clarified to focus on waste management 'plans' or 'planning'. The following comments are offered for the Plan Review Process and Guidelines Working Group's consideration.

Section 2 is somewhat confusing. The title does not really reflect the content which might better be described as 'Waste Management Activities and Planning'. The introduction does not lead smoothly into the rest of the section as the items listed on page 2 (a – g) are a mixture of ideas and do not relate directly to the subsections which follow. There is a better description of the content on page 12 item (f). The Table of Contents is also not helpful as it does not provide a clear indication of the material covered in the section – it would probably be best to include all subsections (2.1.1 – 2.1.5). This section on Waste Management Planning should also identify the need for the establishment and maintenance of waste inventories and records, especially for toxic and hazardous materials and there may be regulatory requirements in this regard. If the materials are released, there may be public reporting required through the National Pollutant Release Inventory and this should be referenced in these Guidelines. Within the section on thermal treatment, it would also be helpful to include a reference to the following document, "Technical Document for Batch Waste Incineration", Environment Canada (March 2009).

The title of Section 3 seems a bit narrow as it includes information on waste disposal options as well as regulatory requirements. Perhaps 'Waste Disposal Methods and their Regulatory Requirements' would be preferable. In the section, the terms Waste disposal and Waste



management tend to be used interchangeably. As section 3 appears to deal with disposal options (as the title indicates), it would make the document clearer if a more rigorous distinction was made between these two terms. The first two paragraphs correctly refer to Waste management while virtually all the rest of the section should refer to Waste disposal.

On page 6, there is a good discussion of the basic information required in support of a request for any Waste disposal option. It would be good to emphasize that these requirements are part of all of the following subsections as this requirement tended to 'get lost' in the subsequent subsections.

The Agency is pleased to see a requirement for a detailed Closure Plan at the earliest stages of development. The draft Closure and Reclamation Plans Preparation Guidelines should be referenced. Of particular interest would be the determination of which Site Remediation Standards would be employed, as early in the process as possible.

On page 10, part (c) under the regulatory requirements for sumps should include monitoring (both during and post-closure). The document could reference "The Protocol for the Monitoring of Drilling-Waste Disposal Sumps", (2006) Northwest Territories Water Board. While this document was developed for the Inuvialuit Settlement Region, the principles should be applicable in other jurisdictions.

Page 12, the structure of Section 4 could be modified to include 4.1 Background Information and 4.2 Waste Types and their Management. This would then be reflected in the Table of Contents.

The Agency trusts that these comments will be useful and would be happy to discuss them in greater detail if that would be helpful.

Sincerely,



Bill Ross
Chairperson

cc. Society Members
Bruce Hanna, Fisheries and Oceans
Anne Wilson, Environment Canada