

Water License Application MS08 273 response to Water Board Questions Nov 2008

1. Schedule 4 Application amended to 1200m³/day Nov.25, 2008. (Initialled TT)

2. City of Whitehorse form- Clint contacted the City of Whitehorse regarding formal authorization to use the site (and may have already submitted this?) MS08 273

3. Clause 29 states:” The iodine shall be neutralized prior to discharge into McIntyre Creek. A maximum of .1 mg/L of iodine may be contained in the discharge.”

We request that the clause be reduced to just the second sentence: “ A maximum of .1 mg/L of iodine may be contained in the discharge.”

Rationale: Iodine is used to disinfect equipment, with most equipment disinfected in the sheds away from the creek. Only the capilano troughs are disinfected in the channel. A maximum of 1 L of 100ppm solution is used to paint a trough. When the 2.2m³ capilano trough is filled for rinsing, this results in a maximum concentration of .04 mg/L. leaving the trough. This is further diluted by about 4 parts untreated water to 1 part treated water when the trough effluent is released into the groundwater ditch, so discharge from the site can be controlled by controlling input.

Much of the inputted iodine is either removed from the water column through binding to organic mater or reduced to iodide, resulting in even lower concentrations of iodine.

Neutralization thus occurs without further chemical input.

The level of iodine released from the site will be easily kept within the guideline when using Ovadine for equipment disinfection purposes.

4. Clause 30 in MS02-209 states: “All monitoring shall be conducted on a quarterly basis, unless otherwise required by this license.”

We request that this clause be amended to say “ Monitoring shall be conducted on an annual basis, during the period of maximum fish food use, unless otherwise required by this license.”

Rationale: Egg and alevin stages present from August to late March do not require food. Because feeding only occurs on the site between late March and July, phosphorous levels are unlikely to be detectable during other times. Previous monitoring has resulted in undetectable levels during the winter months. Testing during these periods is therefore considered an unnecessary expense.

Clause 33 states:“ Prior to any discharge from the interceptor ditch, a grab sample shall be taken at the discharge point of the interceptor ditch on the unnamed tributary of McIntyre Creek. The grab sample shall be analyzed for Total Phosphorus and Iodine.”

We request that this be amended to state:

“During the sample period, a grab sample shall be taken in the interceptor ditch immediately upstream of the point where it discharges into McIntyre Creek. The grab sample shall be analyzed for Total Phosphorus.”

Rationale: The original language is unclear: The interceptor ditch and the unnamed tributary are the same body of water. The project has no way of stopping the flow in the interceptor ditch.

Iodine input is minimal (see #3 above) and therefore iodine discharge from the channel will be minimal. The level of iodine released from the site will be easily kept under the

permitted level when using Ovacine for equipment disinfection purposes. Expensive sampling of effluent should not be necessary.

5. The current YESAB project application (2008-0193) was submitted as a prerequisite for replacing the water licence, which expired at the end of July, 2008. The other YESAB applications refer to YESAB applications that were submitted to get fish transplant approval. As fish transplants have already been approved (in YESAB applications 2008-0058 and 2006-0189) it is a Yukon Government, rather than Fisheries & Oceans Canada decision that is required for this project. Unfortunately, the timing of the need for YESAB licensing approval did not coincide for the fish and water portions of the project, complicating the determination of project scope. Yukon Government did not identify itself as a decision body, and the proponent was not aware that they were a decision body. Rob Walker, DAP Manager with the Yukon Government was contacted. He will be discussing how to proceed with the Department of Environment and with YESAB.

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