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Submitted Via E-Mail  
Our File: 1BR-SAR0607  
Your File: \_\_\_\_\_  
CIDM #188555

December 13, 2007

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Nunavut Regional Office  
Indian & Northern Affairs Canada  
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**RE: Water License Inspection of Sarcpa Lake Cam –F Clean up – July 15<sup>th</sup>, 2007**

The Water Resources Officer (WRO) appreciates the assistance and cooperation provided by Robert Guillaume, Project Coordinator (BioGenie), and Ken Skafffeld and Cathy Corrigan, both of UMA who assisted the Inspector during the information gathering and inspection of the site.

The following report is based on observations made at the time of the inspections at the Sarcpa Lake Dew line site clean-up. A review of the terms and conditions of the water license (1BR-SAR0607) was conducted during the Inspection.

Immediately following the inspection a Water Use Inspection Form outlining the concerns of the inspector was signed off by the parties with the Inspector.

**Part A: Scope and Conditions**

No issues were found with respect to the location of the camp as it relates to the information contained within the current license. The current license was July 14<sup>th</sup>, 2006 to the Department of Indian and Northern Affairs, Government of Canada and is a renewal license.

The license, as issued, is a Type “B” license classed as Industrial undertakings.

**Part B: General Conditions**

The issues of water use fees and security were not included within the context of this inspection.

A review of the Nunavut Water Board FTP – Public Registry was conducted during the writing of this report. An annual report for the 2006 annum, completed by Indian and Northern Affairs was located.

This report is a requirement under the terms and conditions of the Water License. The annual report must include but should not be limited to those items listed in Section 1 (i) through (xi) of this Part.

Upon review of the report it was noted that the report was deficient in the following;

- No daily quantities of water use were provided as per Section 2 (i). (Daily water logs were noted on-site)
- No as-built drawings were provided for 2006. It is assume they will be provided in 2007 report.



The proponent is reminded that an annual report is required to be filed by March 31<sup>st</sup> 2008 for the year ending December 31<sup>st</sup> 2007. The annual report **must** include but not be limited to those items listed in Section 1 (i) through (vi) inclusive, of this part as well as any information required by the Inspector.

The licensee is reminded that it is the responsibility of the licensee to ensure that any documentation submitted by the licensee to the Nunavut Water Board is acknowledged by the Manager of Licensing.

During the period of inspection the Inspector noted that flow meters had not been installed on the intake lines. Water Volumes were estimated based on water truck tank volumes and the number of loads.

### **Part C: Conditions Applying To Water Use**

At the time of the inspection the licensee was allocated the use of 1,500 Cubic meters of water per year for all purposes. Water for all uses is to come from the designated Sarcpa Lake.

The Licensee is reminded to ensure that the intake hoses are equipped with a screen to prevent the entrapment of fish. Samples were collected at the time of the inspection.

Analytical results received by the inspector were all within the Canadian Council of Ministers of the Environment (CCME) guidelines for drinking water;

An inspection of the intake system was conducted, a filter system and UV system were both present and in working order.

The Inspector noted the presence of silt fencing in a number of areas on site. The Licensee is commended for taking such actions to prevent the entry of sediment generated by the project from migrating into water.

### **Part D: Conditions Applying to Waste Disposal**

An incinerator was found to in use on site. The licensee is reminded that they are to **incinerate** all combustible waste in an approved incinerator that will meet or exceed the Canada-wide Standards for Dioxins and Furans and the Canada-wide Standard for Mercury Emissions.

No camp waste water was available for testing during the period of Inspection. No samples of grey water were collected.

During the period of Inspection the Land Fill was in the final stages of construction with the Liner currently being welded. Capacity of the Tier II unit was estimated to be 7,500 Cubic meters.

It was stated during the Inspection that sludge from the RBC would be transported off site before demobbing the camp for transport to a new location. The Inspector will await confirmation in the annual report for 2007.

### **Part E: Conditions For Camps and Access Infrastructures**

No issues were brought to the attention of the inspector under this section.



#### **Part F: Conditions Applying To Drilling Operations**

No Drilling was on-going during the period of Inspection.

#### **Part G: Conditions Applying To Modifications**

A review of the Nunavut Water Board FTP site could not locate any requests for approval of modifications. No Modifications were brought to the attention of the inspector during the period of Inspection.

#### **Part H: Conditions Applying To Spill Contingency Planning**

A review of the Nunavut Water Board FTP site, conducted during the writing of this report could not locate the Required Spill Contingency Plan. The 2006 Annual report notes that no revisions or up-date had been made in the year 2006.

A copy of the Spill Plan was made available by the Licensee during the writing of this report. The Plan required up-dates to it's contact list and this should have been done annually. It appears this Plan has not been up-dated since 2004. The Licensee is reminded that this is to occur annually.

#### **Part I: Conditions Applying To Abandonment And Restoration**

As noted, the current License issued by the Nunavut Water Board expires on December 31<sup>st</sup> of 2007. As required by Section 1 of this Part the Licensee is to have all work would be completed prior to the expiry of the issued license. During the writing of this report this was confirmed by the licensee.

It is expected that machinery and equipment currently on site are to be hauled out this winter to their new location.

The Inspector will look to confirm this in the expected 2007 annual report.

#### **Part H: Conditions Applying To Monitoring Programs**

As per Section 1 of this Part the Licensee was to measure and record in cubic meters the daily quantities of water utilized for Camp operations and all purposes. This record was to have been submitted in the 2006 annual report. The Licensee is reminded to include this in the 2007 annual report due on March 31<sup>st</sup> 2008.

As per Section 2 of this Part the Licensee is to determine and record the GPS co-ordinates of all locations where wastes associated with the camp operations are deposited.

As per Section 3 of this Part the Licensee is to record the GPS coordinates of all locations where wastewater effluents meeting the Wastewater Discharge Criteria are deposited. This information **including copies of sample results** are to be included in the 2007 annual report.

The Licensee was required to submit a copy of the Quality Assurance/ Quality Control Plan for approval to the Nunavut Water Board by August 16<sup>th</sup>, 2006. A review of the Nunavut Water Board FTP site could not locate this document. The Licensee provided a copy of this plan during the writing of this report.

The Licensee is reminded that a copy of the Post Closure Monitoring Plan was to have been submitted to the Nunavut Water Board on July 31<sup>st</sup> 2007. A copy of this Plan was not located on the Nunavut Water Board FTP site. This Plan is a requirement of the current license and as such the failure to file, for the approval of the Nunavut Water Board, the required Plan, is a violation of the Nunavut Waters and Nunavut Surface Rights Tribunals Act.



The Licensee is reminded that failure to comply with the terms and conditions of the issued water license constitutes an offence under the Nunavut Water and Nunavut Surface Rights Tribunals Act.

The Licensee is directed to provide a copy of this Plan as an addendum to the 2007 annual report.

**Non-Compliance:**

During the inspection a number of items were noted and are to be corrected before the period of the next Inspection.

- Location of the treatment facility where hazardous wastes generated or marshalled on site are to be shipped- to be included in annual report.
- Submission of a revised Spill Contingency Plans and approval of the Nunavut Water Board as addendum to 2007 annual report.
- Installation of metering system to accurately record water use.
- Submission of the GPS coordinates and sample results for all waste water effluent discharged under the current license.
- Submission of the Post-Closure monitoring Plan for the approval of the Nunavut Water Board
- As-Built Drawings as required – Part E Section 8
- Submission of site for disposal of Sewage Sludge generated during the course of the project.

**Andrew Keim**  
**Inspector's Name**

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**Inspector's Signature**

Attached under separate cover;  
Photos taken during Inspection of July 15<sup>th</sup> , 2007

Cc:  
Peter Kusugak – Manager Field Operations Section- Indian and Northern Affairs Canada  
Phyllis Beaulieu – Manager licensing – Nunavut Water Board