

Water Resources Division Nunavut Regional Office Iqaluit, NU X0A 0H0

Feb 18, 2010

Richard Dwyer License Administrator P.O. Box 119 Gjoa Haven, NU X0A 0H0

Re: Type "A" Water License Application – Renewal of Type "B" 3BM – ARV0308 - Hamlet of Arviat

NWB File: 3AM-ARV----

CIDMS #: 383952

Please be advised that Indian and Northern Affairs Canada (INAC) have completed a review of the water license application for 3AM-ARV – Hamlet of Arviat. The NWB circulated the Application for comments on December 21, 2009. All associated documents related to this application posted on the NWB ftp site under 3AM-ARV were included in my review (See attached Technical Review Memo).

Should you have any questions or comments, please do not hesitate to contact me at (867) 979-4282 or by email at lan.Parsons@inac.gc.ca.

Sincerely,

Original signed by

lan Parsons Water Resources Technician

Cc. Lou-Ann Cornacchio, Manager of Water Resources – Indian and Northern Affairs Canada, Nunavut Regional Office





Technical Review Memorandum

To: Richard Dwyer – License Administrator, NWB
Elwood Johnston – Interim Senior Administrative Officer, Hamlet of Arviat.

From: Ian Parsons – Water Resources Technician, Indian & Northern Affairs Canada.

Re: 3AM-ARV---- - Type "A" Water License Application - Renewal of Type "B" 3BM - ARV0308 - Hamlet of Arviat

Background

The Hamlet of Arviat's water license expired on December 31, 2008. The Hamlet of Arviat has been operating without a water license since this date. The Hamlet of Arviat is now in the process of renewing their water license as all the appropriate paperwork has been submitted for review.

Comments/Recommedations

The 2009 water license application for the Hamlet of Arviat submitted by the Hamlet of Arviat (Elwood Johnston – SAO) addressed most parts of the water license application. However, it has been noted that the following items remain outstanding or require further explanation.

- 1. The following items remain outstanding and were required as part of a complete application:
 - 1a) Operating capacity of pump used and intake screen size used.
 - 1b) Conditions applying to the monitoring Program of the water licence; water sampling is required. (see Part H of the licence)
 - 1c) Monthly and annual data for water use and waste disposal is based on water delivery records (water delivered equals effluent waste disposal). INAC considers this an adequate record



- 1d) Items under **Part B Item #1** of the water license remain outstanding. These include i) tabular summaries of all data generated under the Monitoring Program. ii) a summary of modifications and major maintenance work carried out on water supply and waste disposal facilities. iii) list of unauthorized discharges. iv) a summary of abandonment and restoration work completed and any work anticipated for the next year.
- 1e) Hazardous waste management plans, procedures and protocols should be adopted.
- 2. Items requiring further clarification or discussion:
 - 2a) Water supply filtration changes are mentioned in the license application and should be included in the Operation and Maintenance plan.
 - 2c) The Operation and Maintenance (O and M) plan for the solid waste facility states: that the Hamlet burns combustible waste as a way to reduce volumes of wastes. This, however contradicts the water license application where it is stated that burning of combustible waste does not take place
 - 2d) It is stated in the O & M Plan that "seven hundred and fifty cubic meters of contaminated soil was reportedly removed from the N.W.T. Power Corporation (NWTPC) tank farm and brought to the Bulky Waste site for landfarming. Some of the soil has been spread over the former landfill with approximately 300 m³ still in piles. The soil is believed to be contaminated with diesel. The proposed new landfill site will have an area set aside for bulky metals and a landfarm. It is proposed that the contaminated soil at the bulky metals site be evaluated and handled according to regulations. No time table has been set to address this issue." Nuna Burnside. Standard operating procedures should be provided to indicate how the contaminated material and any run off will be minimized including appropriate timelines and future activities.
 - 2e) Runoff from the solid waste disposal site is required to be prevented and controlled from moving into the environment. As of the last INAC inspection this has not been done. Use of contaminated soil as cover material may accelerate existing runoff from landfill.
 - 2f) Under the Environmental Emergency Contingency Plan, section 1.4 heading states Hamlet of Whale Cove. This Heading should be changed to say Hamlet of Arviat.



3. Sewage Lagoon:

- 3a) In the Operation and Maintenance plan of sewage lagoons it states that the lagoon continuously seeps sewage through the berm to the wetland area. The O and M Plan states that the seepage out of the lagoon equals input into the lagoon as the level of the lagoon remains constant. The O and M plan also calculates retention time in lagoon as 149 days, but this calculation does not consider seepage amounts.
- 3b) There is no decanting/discharge schedule provided in the submission. However, in the supplemental Questionnaire to the water license application the proponent states that there is a seasonal discharge of sewage to the wetland area of 3-4 weeks in June and again in September if necessary. No discharge should take place without advising an INAC Inspector first as per water license. Decant operations should also be included in the O and M Plan of the Sewage Treatment Facility.
- 3c) There are two discontinued sewage lagoons that are no longer in use. As a result there should be an abandonment and restoration Plan

Summary;

The outstanding items in comments #1 and #2 above should be addressed but are not critical to the issuance of the licence. Comment #3 however should be resolved prior to the issuance of the licence. Specifically our concern is around the lack of knowledge of the impact of the sewage seeps through the berms. The concerns are based on the seeps affecting the integrity of the berm and the impact of seepage on the environment as there is no monitoring data to assess impacts. INAC inspectors have noted CCME exceedances during previous inspection years.

Clearly the lagoon would afford some form of the intended treatment if some retention time was provided, rather than seeping out at a constant rate as suggested by comment #3a above. Repairs to the berm along with some monitoring would provide some assurance that the lagoon is operating as intended reducing the potential for environmental impacts as well as the potential for catastrophic failure of the berm.

This information has been forwarded to our Field Operations Unit.

Cc. Lou-Ann Cornacchio, Manager of Water Resources – Indian and Northern Affairs Canada, Nunavut Regional Office Peter Kusugak, District Manager – Indian and Northern Affairs Canada, Nunavut Regional Office



