# **Multi Year Municipal Compliance Summary**

Arviat 3AM-ARV1015

Source: Wolf River Creek

Licensee: Hamlet/ Government of Nunavut

Start and Expiry Dates: 8/23/2010 8/31/2015

Status: Active Sampling Results: Incomplete

#### **Administrative Reporting General**

2011 - O&M Plan and A&R Plan Submitted
Annual reports for 2006 and 2007 have not been filed
Sampling results as required under 3AM-ARV1015 have been submitted

#### 2007 Reporting

- Failure to install and maintain SNP Stations
- Failure to submit O&M Plan for both the sewage and Waste management facilities
- Failure to submit an A&R Plan for Old Lagoon systems
- Failure to manage wastes within the facility, I.e. lack of segregation and hazardous wastes storage area
- Failure to manage runoff from the waste management facilities

### 2008 Reporting

- Government of Nunavut owns and operates the water treatment and pumping facilities.
- Failure to provide records on Water usage at the time of the Inspection
- Failure to collect samples and submit results
- Failure to properly manage Waste Management Areas
- Failure to manage runoff from the waste management facilities
- Failure to Submit Plans and Application for renewal as required

## 2009 Reporting

- Government of Nunavut owns and operates the water treatment and pumping facilities.
- Failure to address concerns identified by the Inspector regarding effluent leaking from the Sewage Lagoon
- Failure to address concerns identified by the Inspector concerning Water Management within the Waste Management areas.
- Failure to collect and submit for analysis the samples required on the Monitoring Program.
- Failure to take steps to control and mitigate runoff from the Solid Waste Management Facility
- Failure to develop a Solid Waste Disposal Operations and Maintenance Manual
- Failure to submit required Annual reports (Part B (1 i through viii)) (it is noted that an Annual report for 2008 was submitted with the renewal application to the Nunavut Water Board and was found to be incomplete)
- Failure to maintain the appropriate Surveillance Network Program (SNP)( Part B (5))
- Failure to notify the Inspector prior to decant as required (Part D(4))
- Failure to identify and submit the Final discharge points for the current lagoon system (Part D (8))
- Failure to submit as-built documents and drawings properly certified of the "new lagoon" as required under (Part E (4))
- Failure to submit as required the appropriate Abandonment and Restoration Plans (Part G (1))
- Failure to implement the requirements listed under the Monitoring Program ( Part H)
- Failure to development and submit a QA/QC Plan. Part H (6))

Failure to Maintain the Sewage lagoon to the satisfaction of the inspector ( Part D(5))

### 2010 Reporting

It is noted that a new License was issued this year.

#### Potable Source

- Government of Nunavut owns and operates the water treatment and pumping facilities.
- Chlorination testing records were available for review
- Noted that not all trucks are tested on a daily basis. Recommended change to SOP
- Recommended the Gov. of Nunavut apply for License for activity
- No meters had been installed at the time of the inspection.

#### Waste: Lagoon

- Lagoon effluent ex-filtrating through berm wall continues to mix with leachate migrating off the Municipal waste management area. This has been identified for the licensee as an issue since 2007. The Licensee has failed to address after repeated warnings.
- Failure to address the 2 Old Lagoon systems which have not been remediated since the construction of the current lagoon in 2005. The Licensee has failed to submit A&R plans to address as required.
- The current Lagoon has never needed decanting as the Lagoon walls allow effluent to flow through without any holding times.
- Failure to submit A&R Plans as required

#### Waste: Solid Waste Management Area

- The solid waste management area remains un- segregated
- Hazardous wastes and contaminated soils are stored within the facility without secondary containment
- Failure to properly manage Waste Management Areas
- Failure to manage runoff from the waste management facilities

### 2011 Reporting

It is noted that the Licensee has prepared and submitted a Plan for Compliance as required by the Inspector in 2010

#### Potable Source

- The Government of Nunavut, Dept. of Community and Government Services continues to own, operate and staff a Class 2 Water Treatment facility without the authority of a license
- Chlorination testing records were available for review
- On-going maintenance and repair of rips to cell 1 liner were on-going during Inspection
- Recommended the Gov. of Nunavut apply for License for activity
- No meters had been installed at the time of the inspection.
- As the Government of Nunavut retains the ownership of the pump house, intake and treatment facilities, and employs staff to provide water treatment services to the Municipality of Arviat, the Government of Nunavut, Department of Community and Government Services should apply for a Water License for this activity. This would be consistent with previous licensing precedents in communities such as Rankin Inlet and Resolute Bay. The ownership and operations of the facility were confirmed by staff on site contrary to the document submitted Dec 22, 2010 by Nuna Burnside on behalf of the Government of Nunavut and the Licensee in response to the Inspection carried out on September 2nd of 2010.

### Waste: Lagoon

- Lagoon effluent ex-filtrating through berm wall continues to mix with leachate migrating off the Municipal waste management area. This has been identified for the licensee as an issue since 2007. The Licensee has failed to address after repeated warnings.
- Failure to address the 2 Old Lagoon systems which have not been remediated since the construction of the current lagoon in 2005. The Licensee has failed to submit A&R plans to address as required.

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- The current Lagoon has never needed decanting as the Lagoon walls allow effluent to flow through without any holding times.
- Failure to submit A&R Plans or address two decommissioned lagoons as required

### **Waste: Solid Waste Management Area**

- The solid waste management area remains un- segregated
- Hazardous wastes and contaminated soils remain stored within the facility without secondary containment
- Signage required replacement
- Failure to properly manage Waste Management Areas / Lack of cover material
- Failure to runoff from exiting the waste management facilities

### HAMLET OF Arviat 3AM-ARV1015 Non-compliance Overview between 2007 and 2011

NB. It is noted that in Dec of 2010 the Licensee (Agent) submitted a Plan for Compliance. A number of the items within the Plan have been rejected by the Inspector. The Licensee identifies the lack of third Party financing as justification for non-compliance with the issued license. This is, in the Inspector's opinion not reasonable excuse for non-compliance.

It is also noted that the Plan for compliance states that once the Board approves changes to the compliance requirements of the license then funding will be allocated to ensure compliance is achieved. This is not acceptable.

#### Part B (J) Failure to submit plans as required

- A&R Plans for the decommissioned lagoons
- Water management within the Waste Management Areas
- Part B (4) No approval by the Board
- Part B (5) No approval by the Board
- Part B (6) Failure to install Meters\*
- Part B (7) Failure to install and maintain proper signage\*
- Part B (8) Failure to submit plans that include firm timetables and dates (Compliance Plan) \*
- Part B (16) Failure to provide translated Documents to the NWB. \*
- Part C (3) Failure to install screen at Intake\*
- Part D (2) Failure to meet discharge criteria ( Moving the sampling location is not an acceptable alternative)
- Part D (5c) Failure to submit geotechnical report on impact of untreated effluent on environment
- Part D (5e) Failure to submit a Sludge Management Plan
- Part D (6c) Failure to segregate and securely store Hazardous materials and wastes within a specified area and to prevent the deposit of wastes into water
- Part D (7) Failure to not open burn plastics, wood treated with preservatives, electric wire, styrofoam, asbestos or painted wood to prevent the deposition of Waste materials of incomplete combustion and/or leachate from contaminated ash residual, from impacting any surrounding Waters
- Part D (8) Failure to maintain records of wastes removed or disposed of on site
- Part D (9) Failure to Store Hydrocarbon contaminated soils in a manner to prevent the deposit of deleterious substances into any water
- Part D (15) Failure to implement measures to ensure hazardous materials and/or leachate from the Waste Disposal Facilities does not enter Water
- Part F 1(a-c) Failure to submit up-dates to Sewage Treatment Facility Operation and Maintenance (O&M) Plan, Hamlet of Arviat as required
- Part F 2 (a-e) Failure to submit up-dates to Solid Waste Management Facility Operation and Maintenance (O&M) Plan as required

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Part G (4) Failure to undertake such progressive reclamation on the 2 decommissioned lagoons as required.

\* indicate instances where the License has indicated that compliance is founded upon securing funding. Failure to secure funding therefore prohibits compliance. This is not acceptable to the Inspector, compliance is not optional.

Inspections and review completed by Field Operation Section, AANDC

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