

File: 3AM-ARV1016

September 4, 2020

Steve England Hamlet of Arviat PO Box 150 Arviat, NU X0C 0E0 Sarah Collins
Government of Nunavut - Community and
Government Services
PO Box 490
Rankin Inlet, NU
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Email: sao@arviat.ca Email: SCollins@gov.nu.ca

RE: Licence No: 3AM-ARV1016, Type "A"; Hamlet of Arviat; 2019 Annual Report

Review

Dear Steve England and Sarah Collins:

The Nunavut Water Board (NWB or Board) has completed the technical review of the 2019 Annual Report (Report) for Type "A" Water Licence 3AM-ARV1016 (Licence) issued to the Hamlet of Arviat (Hamlet or Licensee). The Report was received on June 1, 2020 from Government of Nunavut - Community and Government Services (GN-CGS) and submitted as a requirement under Part B of the Licence.

Copies of all documents received during Report review can be accessed through the NWB's Public Registry and FTP site using the following link:

ftp://ftp.nwb-oen.ca/registry/3%20MUNICIPAL/3A/3AM%20-%20Municipality/3AM-ARV1016/3%20TECH/1%20GENERAL%20(B)/2%20ANNUAL%20RPT/

On June 2, 2020, the NWB distributed the Report to the Kivalliq distribution list for review. Comments from Environment and Climate change Canada (ECCC) and Crown-Indigenous Relations and Northern Affairs (CIRNA) were received on July 30, 2020 and August 4, 2020, respectively. The table below provides a brief summary of issues found outstanding during the Report review period. The table provides deadlines for the Licensee to respond to respective recommendations and concerns. For the intervenors' discussion of these items, please refer to the comment submissions referenced above.

No.	Intervener Recommendation / Concern	Deadline to Respond by and		
		Provide Outstanding Information		
Crown-I	ndigenous Relations and Northern Affairs (CIRNA)	moment		
1	Water Licence No: 3AM-ARV1016 expired in 2016.	The Board notes that GN-CGS		
1	The Licensee to make all necessary efforts to renew it	informed the NWB of its plans to		
	as early as possible.	submit an application to renew		
	as carry as possess.	and amend the Licence in the fall		
		of 2020.		
2	Based on information provided in Appendix E, there	October 5, 2020		
	were four sets of monitoring data. It seems that	·		
	monitoring data for September 20, 2019 were not			
	included in Appendix A. In addition, the result of fecal			
	coliforms on July 7, 2019 was >24,200 (104 CFU/100			
	mL) in Appendix A, but at 24,200 (104 CFU/100 mL)			
	in Appendix E. Clarify the discrepancies in Appendix			
	E.			
3	Include a map of the location of the monitoring	Subsequent annual reports		
	stations.			
	nent and Climate Change Canada (ECCC)			
1	Document the visual observations on algal	Subsequent annual reports		
	presence/effluent colour during effluent sampling.			
	Include concentration units for oil and grease			
2	measurements in future annual reports. Describe what "ARV-2" refers to in the Report. Clarify	October 5, 2020		
2	whether both stations ARV-2a and ARV-2b were	October 5, 2020		
	monitored in 2019 and, if not, why. Provide any			
	available 2019 monitoring results for station ARV-2b.			
3	Include in future annual reports:	Subsequent annual reports		
	Highlighted and/or bolded font on summary	1		
	tables to indicate any water licence			
	exceedances; and			
	Discussion of monitoring results, particularly			
	regarding any exceedances, any potential or			
	known causes, and any response actions taken.			
4	List any follow-up actions taken for any spills/	Subsequent annual reports		
	unauthorized discharges.			
5	Provide a figure or map indicating the locations of all	Subsequent annual reports		
	monitoring stations.	(echoing CIRNA's comment #3)		
6	Provide a discussion of the elevated concentrations of	October 5, 2020		
	ammonia and copper associated with the sewage			
	lagoon and solid waste facility. This should include a			
	discussion of the level of treatment that is achieved by			
	the lagoon and wetland area, and how this can be			
	optimized.			
Nunavut Water Board (NWB)				
1	The NWB notes that the Licensee consistently	Subsequent annual reports		
	withdraws water well in excess of the amount			
	permitted by the Licence.			
2	The NWB notes that the Licensee consistently exceeds	October 5, 2020		
	the Effluent limits set for ARV-4. The Board reminds			

3	the Hamlet to adhere to the Effluent quality limits as set out by the Licence. The Licensee should provide an explanation of exceedances and discussion on actions necessary to adhere fully to the Effluent quality limits. The Board does not have a record of receiving the	October 5, 2020
	2016 Annual Report. Please submit the outstanding information or an explanation.	
4	The Board does not have a record of receiving the documentation as required by Part C, Item 4 of the Licence: submit to the Board for approval in writing by December 31, 2010, as-built drawings stamped and signed by an Engineer confirming compliance with the [Fisheries and Oceans Canada] guideline "Freshwater Intake End of Pipe Fish Screen Guideline". The drawings shall include information regarding the operating capacity of the pump used and the intake screen size.	October 5, 2020
5	The Board does not have a record of receiving the documentation as required by Part D, Item 3 of the Licence: at least three (3) months prior to commissioning the New Solid Waste Disposal Facility and/or Hydrocarbon Impacted Soil Storage and Treatment Facility, submit to the Board, for approval in writing, a revised Solid Waste Management Facility Operations and Maintenance (O&M) Plan referred to in Part F, Item 2, to address the New Solid Waste Disposal Facility and/or Hydrocarbon Impacted Soil Storage and Treatment Facility.	October 5, 2020
6	The Board does not have a record of receiving the documentation as required by Part D, Item 10 of the Licence: submit to the Board for approval in writing, at least sixty (60) days prior to the commissioning of a Hydrocarbon Impacted Soil Storage and Treatment Facility, a Hydrocarbon Impacted Soil Storage and Treatment Facility Management Plan including proposed Effluent quality limits for Monitoring Program Station ARV-10.	October 5, 2020
7	The Board does not have a record of receiving the results of geotechnical inspections as required by Part D, Items 16 and 17 of the Licence.	October 5, 2020
8	The Board does not have a record of receiving the documentation as required by Part F, Items 1 and 2 of the Licence and outlined in the April 29, 2011 correspondence from the NWB:	October 5, 2020

	within sixty (60) days following Board approval of the Sewage Disposal Facility Report referred to in	
	Part D, Item 5, submit to the Board, for approval in writing, a revision to the Plan entitled "Sewage Treatment Facility Operation and Maintenance (O&M) Plan, Hamlet of Arviat" May 2009, revised May 2010	
	and	
	within sixty (60) days following Board approval of the Solid Waste Disposal Facility Report referred to in Part D, Item 14, submit to the Board, for approval in writing, a revision to the Plan entitled "Solid Waste Management Facility Operation and Maintenance (O&M) Plan, Hamlet of Arviat" January 2009, revised May 2010	
9	The Board does not have a record of receiving documentation as required by Part F, Item 3 of the Licence:	October 5, 2020
	at least three (3) months prior to commissioning the New Solid Waste Disposal Facility and/or Hydrocarbon Impacted Soil Storage and Treatment Facility, submit to the Board, for approval in writing, a revised Solid Waste Management Facility Operations and Maintenance (O&M) Plan referred to in Part F, Item 2, to address the New Solid Waste Disposal Facility and/or Hydrocarbon Impacted Soil Storage and Treatment Facility.	
10	The Board does not have a record of receiving documentation as required by Part H, Item 16 of the Licence:	October 5, 2020
	at least sixty (60) days prior to commissioning the New Solid Waste Disposal Facility and/or Hydrocarbon Impacted Soil Storage and Treatment Facility, submit to the Board, for approval in writing, a revision to the Environmental Monitoring Program and Quality Assurance/Quality Control (QA/QC) Plan, referred to in Part H, Item 15, to address the New Solid Waste Disposal Facility and/or Hydrocarbon Impacted Soil Storage and Treatment Facility.	

The Board notes that the Licence expired on February 27, 2016, and the Licensee has since operated without a valid water licence. The Board reminds that if a licence expires before the NWB issues a new one, then the use of Water and the deposit of Waste must cease, or the Licensee may be in contravention of the Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in Right of Canada (Nunavut Agreement) and the Nunavut

Waters and Nunavut Surface Rights Tribunal Act (NWNSRTA). However, the expiry or cancellation of a licence does not relieve the holder from any obligations imposed by the licence. The Board also notes that the Licensee, under its expired licence, recently constructed a new water treatment plant and a new water reservoir and commissioned them in November 2019, as indicated in the Report without approvals. The NWB is hopeful that, with the application for Water Licence renewal/amendment planned for fall 2020, the Hamlet will adhere to the requirements of its water licence and in accordance with the Nunavut Agreement and the NWNSRTA.

If you have any questions, please contact the undersigned at assol.kubeisinova@nwb-oen.ca or (867) 360 6338 (ext. 31).

Best regards,

Assol Kubeisinova Nunavut Water Board Technical Advisor

Cc: Distribution List – Kivalliq