



P.O. Box 119, Gioia Haven, NU X0B 1J0, Tel: (867) 360-6338, Fax: (867) 360-6369

No.	Intervener Recommendation / Concern	Deadline to Respond by and Provide Outstanding Information
<b>Crown-Indigenous Relations and Northern Affairs (CIRNA)</b>		
1	Water Licence No: 3AM-ARV1016 expired in 2016. The Licensee to make all necessary efforts to renew it as early as possible.	The Board notes that GN-CGS informed the NWB of its plans to submit an application to renew and amend the Licence in the fall of 2020.
2	Based on information provided in Appendix E, there 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.	October 5, 2020
3	Include a map of the location of the monitoring stations.	Subsequent annual reports
<b>Environment and Climate Change Canada (ECCC)</b>		
1	Document the visual observations on algal presence/effluent colour during effluent sampling. Include concentration units for oil and grease measurements in future annual reports.	Subsequent annual reports
2	Describe what "ARV-2" refers to in the Report. Clarify whether both stations ARV-2a and ARV-2b were monitored in 2019 and, if not, why. Provide any available 2019 monitoring results for station ARV-2b.	October 5, 2020
3	Include in future annual reports: <ul style="list-style-type: none"> <li>Highlighted and/or bolded font on summary tables to indicate any water licence exceedances; and</li> <li>Discussion of monitoring results, particularly regarding any exceedances, any potential or known causes, and any response actions taken.</li> </ul>	Subsequent annual reports
4	List any follow-up actions taken for any spills/unauthorized discharges.	Subsequent annual reports
5	Provide a figure or map indicating the locations of all monitoring stations.	Subsequent annual reports (echoing CIRNA's comment #3)
6	Provide a discussion of the elevated concentrations of 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.	October 5, 2020
<b>Nunavut Water Board (NWB)</b>		
1	The NWB notes that the Licensee consistently withdraws water well in excess of the amount permitted by the Licence.	Subsequent annual reports
2	The NWB notes that the Licensee consistently exceeds the Effluent limits set for ARV-4. The Board reminds	October 5, 2020

	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.	
3	The Board does not have a record of receiving the 2016 Annual Report. Please submit the outstanding information or an explanation.	October 5, 2020
4	The Board does not have a record of receiving the documentation as required by Part C, Item 4 of the Licence: <i>... 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.</i>	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: <i>... 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&amp;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.</i>	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: <i>... 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.</i>	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

	<p><i>... 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&amp;M) Plan, Hamlet of Arviat" May 2009, revised May 2010...</i></p> <p>and</p> <p><i>... 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&amp;M) Plan, Hamlet of Arviat" January 2009, revised May 2010...</i></p>	
9	<p>The Board does not have a record of receiving documentation as required by Part F, Item 3 of the Licence:</p> <p><i>... 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&amp;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.</i></p>	October 5, 2020
10	<p>The Board does not have a record of receiving documentation as required by Part H, Item 16 of the Licence:</p> <p><i>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.</i></p>	October 5, 2020

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](mailto:assol.kubeisinova@nwb-oen.ca) or (867) 360 6338 (ext. 31).

Best regards,

Assol Kubeisinova  
Nunavut Water Board  
Technical Advisor

Cc: Distribution List – Kivalliq