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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

File No: **3BM-COR1521**

October 6, 2020

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RE: NWB Technical Review of 2018 and 2019 Annual Reports for the Hamlet of Coral Harbour; Water Licence No: 3BM-COR1521

Dear Ms. Collins and Ms. Pameolik:

The Nunavut Water Board (NWB or Board) has completed a technical review of the 2018 and 2019 Annual Reports (Reports) submitted to the Board on September 3, 2019 and June 1, 2020, respectively, to fulfill the requirements of Part B of Water Licence No: 3BM-COR1521 (Licence). Following receipt, the Reports were made available through the Kivalliq distribution list for information. No comments have been received to date.

The technical review of the Reports determined that the information provided addresses the general monitoring requirements of the Licence. However, some of the other Licence requirements were not addressed.

The NWB notes that both the 2018¹ and 2019² Inspection Reports indicated that there is a seepage occurring through the berm of the Sewage Disposal Facility (SDF) and requested *to improve the berm wall directly adjacent to monitoring station COR-3* to preserve structural integrity of the SDF. The Board would like to remind the Licensee that, as per **Part D, Item 5** of the Licence, the SDF *shall be maintained and operated in such a manner as to prevent structural failure of the Sewage Containment Cell*. Therefore, the Board requests that the Licensee, within sixty (60) days from the date of issuance of this letter, provide further clarification as to whether this issue has been resolved or an explanation with a proposed timeline for the repairs.

Additionally, the Board notes that both the 2018 and 2019 Annual Reports provide identical statements with respect to construction of the new Water Treatment Plant (WTP):

¹ Crown-Indigenous Relations and Northern Affairs (CIRNA) Water Licence Inspection Report, July 31, 2018

² Crown-Indigenous Relations and Northern Affairs (CIRNA) Water Licence Inspection Report, July 31, 2019

“The new Water Treatment Plant was substantially completed December 2016 and warranty work is still being completed (Regional CGS Project Management Office). Repairs to the chlorine system were completed during 2018; more work is to come in this regard in 2019.”

The NWB would like to remind the Licensee that, in accordance with **Part E, Item 4** of the Licence, a **Construction Summary Report** should be submitted to the NWB within ninety (90) days of completion of the construction work.

The Board also notes that the Reports did not provide a **summary of the inspections of all engineered facilities** related to the management of Water and Waste, as required under **Part F, Item 5** of the Licence. The NWB would like to remind the Licensee that this condition allowing for such annual inspections to be completed and summarised by a Municipal Engineer was included specifically at the request of the Licensee. Therefore, the Board requires an explanation as to why this commitment was not adhered to, within sixty (60) days from the date of issuance of this letter.

Additionally, the NWB notes that the **Wetland Assessment Study** required under **Part H, Item 14** of the Licence has not been provided to the Board to date. The Licensee is asked to provide this outstanding information to the Board, or an explanation as to why it has not been provided yet, within sixty (60) days from the date of issuance of this letter.

The NWB also notes that the following documents required by the Licence, and also requested within the NWB 2017 Annual Report technical review, have not been provided to the Board to date:

- **Part F, Item 1:**

The Licensee shall submit to the Board for approval in writing by December 31, 2015, a stand-alone **Water Supply Operations and Maintenance Plan**, which includes appropriate conditions and operating procedures to accommodate the Upgraded Water Supply Facility, referred to in Part C, Item 1.

- **Part F, Item 2:**

The Licensee shall submit to the Board for approval in writing within six (6) months of the date of issuance of this Licence, an **Operations and Maintenance Plan for the Solid Waste Management Facility**, prepared where appropriate, in accordance with the *Guidelines for the Preparation of an Operation and Maintenance Manual for Sewage and Solid Waste Disposal Facilities in the Northwest Territories (1996)*, and the *Guidelines for the Planning, Design, Operations and Maintenance of Modified Solid Waste Sites in the Northwest Territories (2003)*. This Manual shall include but not be limited to the following:

- a. Solid Waste Operation and Maintenance Plan;
- b. Hazardous Waste Management Plan
- c. Monitoring Program Station descriptions and locations—including GPS.

- **Part F, Item 3:**

The Licensee shall submit to the Board for approval in writing within six (6) months of the date of issuance of this Licence, an **Operations and Maintenance Plan for the Sewage Disposal Facility**, prepared where appropriate, in accordance with the *Guidelines for the Preparation of an Operation and Maintenance Manual for Sewage and Solid Waste Disposal Facilities in the Northwest Territories (1996)*, and the *Guidelines for the Planning, Design, Operations and Maintenance of Modified Solid Waste Sites in the Northwest Territories (2003)*. This Manual shall include but not be limited to the following:

- a. Sewage Disposal Operation and Maintenance Plan;
- b. Sewage Sludge Management Plan
- c. Monitoring Program Station descriptions and locations—including GPS.

- **Part F, Item 4:**

The Licensee shall submit to the Board for approval in writing within thirty (30) days of issuance of the Licence, a stand-alone **Spill Contingency Plan for Water, Sewage and Solid Waste Operations** including management of hazardous materials in the event of a spill. The stand-alone Plan is to take into consideration the appropriate sections provided in *Guidelines for Spill Contingency Planning (AANDC, 2007)*.

- **Part G, Item 3:**

The Licensee shall submit for review by the Board a **Decommissioning Report for the former solid Waste disposal facility near the Hamlet Airport** within ninety (90) days following Licence issuance. If no Report can be found, the Licensee shall investigate the site with an AANDC Inspector during the next AANDC Municipal Inspection.

- **Part H, Item 13:**

The Licensee shall submit to the Board for information, within ninety (90) days following Licence issuance, a **Quality Assurance/Quality Control Plan** based on the guidance document *Quality Assurance (QA) and Quality Control (QC) Guidelines For Use by Class “B” Licensees in Collecting Representative Water Samples in the Field and for Submission of a QAQC Plan (INAC, 1996)*. The Plan shall include a cover letter from an accredited laboratory confirming acceptance of the Plan for the monitoring and analyses to be performed under the Licence.

Additionally, the NWB has no record of receiving the **2016 Annual Report**, which was due on March 31, 2017. The Board reminds the Licensee that the annual reporting requirements of the Licence should be adhered to at all times, so as to help maintain full compliance with respective terms and conditions of the Licence.

The Licensee is requested to submit to the Board all outstanding information listed above, or an explanation as to why it was missing along with the timeline advising when these outstanding submissions will be provided to the NWB, within sixty (60) days from the date of issuance of this letter.

Should you have any questions, please feel free to contact the undersigned at (867) 360-6338 (extension 29) or sergey.kuflevskiy@nwb-oen.ca, at your convenience.

Sincerely,



Sergey Kuflevskiy
Technical Advisor
NUNAVUT WATER BOARD

Cc: Distribution List – Kivalliq