

## License Conditions

Part B	GENERAL CONDITIONS	Compliance
1	The Licensee shall file, with the Board for review, no later than the 31 st of March of the year following the calendar year being reported, an Annual Report formulated in accordance with the requirements under Schedule B of this Licence.	In Compliance, previous year's reports have all been submitted, the 2019 report is expect to be submitted on May 1, 2020
2	The Licensee shall maintain a copy of this Licence at the Municipal Office, potable Water Treatment Facility, and the Waste Treatment Facilities at all times.	In Compliance
3	The Licensee shall file an application for renewal of this Licence at least one (1) year prior to the Licence expiry.	In Compliance, still outside 1 year from expiry
4	The Licensee shall, to the satisfaction of an Inspector, install, operate, and maintain metres, devices or other appropriate methods for measuring the volumes of Water used and Waste Discharged or deposited.	In Compliance
5	The Licensee shall post the necessary signs to identify the stations of the Monitoring Program included under Schedule I of this Licence. All signage shall be in the Official Languages of Nunavut	In Compliance
6	The Licensee shall, for all Plans submitted under this Licence, include a proposed timetable for implementation. Plans submitted cannot be undertaken without subsequent written approval and/or directions from the Board. The Board may alter or modify a Plan if necessary to achieve legislative objectives and will notify the Licensee in writing of acceptance, rejection, or alteration of the Plan.	In Compliance
7	The Licensee shall, for all Plans submitted under this Licence, implement the Plan as approved by the Board in writing,	In Compliance
8	The Licensee shall, within thirty (30) days of notification or within the timeframe specified by the Board, submit for review and/or Board's approval revisions for any plan found to be unacceptable to the Board,	In Compliance
9	Every Plan to be carried out pursuant to the terms and conditions of this Licence shall become a part of the Licence, and any additional terms and conditions imposed upon approval of a Plan by the Board shall also become part of the Licence. All relevant terms and conditions of the Licence should be contemplated in the development of a Plan where appropriate,	In Compliance
10	The Licensee shall review the Plans referred to in this Licence as required by changes in operation and/or technology and modify the Plans accordingly. Revisions to any Plan shall be submitted in the form of an addendum to be included within the Annual Report required under Part B, Item I, complete with the lists of revisions detailing where significant content changes are made,	In Compliance
11	The Licensee shall immediately report to the NWT/NU 24-Hour Spill Report Line (867-920-8130) any spills of Waste associated with the Undertakings under this Licence including the potable Water Treatment Facility and Waste Treatment Facilities, which are reported to or observed by the Licensee,	In Compliance
12	Any communication with respect to this Licence shall be made in writing to the attention of: Manager of Licensing Nunavut Water Board P, O, Box 119 Goji Haven, NU X0B 1J0 Telephone: (867) 360-6338 Fax: (867) 360-6369 Email: licensing@nwb-oen.ca	In Compliance
13	Any notice made to an Inspector shall be made in writing to the attention of: Water Resources Officer Nunavut District, Nunavut Region P.O. Box 100 Iqaluit, NU X0A 0H0 Telephone: (867) 975-4295 Fax: (867) 979-6445	In Compliance
14	The Licensee shall submit, to the Board for information or as otherwise directed, one (1) paper copy and one (1) electronic copy of all reports, studies, and Plans generated for the works, activities, and undertakings under this Licence. All Reports, studies or Plans submitted to the Board by the Licensee shall include an executive summary in English, Inuktitut, and French.	In Compliance
15	The Licensee shall ensure that any document(s) or correspondence submitted by the Licensee to the Board is received by the Board and maintain on file a copy of the acknowledgment of receipt issued by the Manager of Licensing or his/her designate.	In Compliance
16	This Licence is assignable as provided for in section 44 of the Act.	In Compliance
17	The expiry or cancellation of this Licence does not relieve the Licensee from any obligation imposed by the Licence, or any other regulatory requirement.	In Compliance
Part C	CONDITIONS APPLYING TO SECURITY	
1	The Licensee is not required to post reclamation security for the activities, works, and undertakings authorized under this Licence.	In Compliance

Part D	CONDITIONS APPLYING TO THE USE OF WATERS AND WATER MANAGEMENT PLANS										
1	The Licensee is authorized to withdraw, from the Lake Geraldine Reservoir at Monitoring Station No. IQA-01, up to 1,100,000 cubic metres of Water annually for the relevant activities, works, and undertakings authorized under the scope of this Licence.	In Compliance									
2	<p>The Licensee shall submit to the Board for approval, within sixty (60) days of the Effective Date of the Licence, an updated manual for the potable Water Treatment Facility. The Manual shall be prepared in accordance with relevant aspects of the format outlined in the Guidelines for the Preparation of an Operation and Maintenance Manual for Sewage and Solid Waste Disposal Facilities in the Northwest Territories (GNWT, 1996). The manual shall, address among other items, the following:</p> <ul style="list-style-type: none"> <li>a. Purpose of facility;</li> <li>b. Site setting;</li> <li>c. Operational procedures for storage, treatment and distribution of potable Water; Waste generated and hazardous substances associated with the facility; site inspections; and personnel training;</li> <li>d. Maintenance procedures including equipment servicing;</li> <li>e. Sampling and monitoring requirements; and</li> <li>f. Emergency response measures.</li> </ul>	To be provided on May 1, 2020 with the annual report.									
3	The Licensee shall equip all freshwater intake structures with screens of appropriate mesh size that meet the requirements of Fisheries and Oceans (DFO) Canada's Freshwater Intake End-of-Pipe Fish Screen Guidelines (1995 or the most current) so as to prevent the entrainment of fish and control Water withdrawal rates such that fish do not become impinged within the screens.	The City conducted an eDNA test in Lake Geraldine and it revealed that there were no fish within the lake.									
4	The Licensee shall undertake Dam Safety Inspections (OSI) and/or Dam Safety Reviews (DSR) of the Lake Geraldine water supply facility in accordance with requirements of the Canadian Dam Association (CDA), Dam Safety Guidelines (2007, or the most current version). The Licensee shall submit for the Board's review, within the Annual Report required under Part B, Item 1, the report generated for the DSIs or DSRs along with the Licensee's recommended actions to address any deficiencies identified in the inspections and/or reviews.	In Compliance									
5	The Licensee shall not remove any material from below the ordinary High Water Mark of any Water body unless otherwise approved by the Board in writing.	In Compliance									
6	The Licensee shall not cause erosion to the banks of any body of Water and shall provide the necessary controls to prevent such erosion.	In Compliance									
7	The Licensee shall implement necessary measures to control sediment and erosion prior to and during operations to prevent entry of sediments into Water.	In Compliance									
8	The Licensee shall maintain the potable Water Treatment Facility in accordance with applicable guidelines, procedures, and regulations and to the satisfaction of an Inspector.	In Compliance									
9	The Licensee shall, as part of any proposal to supplement the Lake Geraldine Reservoir, evaluate the potential impact on freshwater resources, including fish and fish habitat. The results of the evaluation must be included as part of any application to augment the Lake Geraldine Reservoir with Water from proximal water bodies.	In Compliance									
Part E	CONDITIONS APPLYING TO THE DEPOSIT OF WASTE AND WASTE MANAGEMENT PLANS										
1	The Licensee is authorized to use the Sewage Lagoon Facility and the Wastewater Treatment Plant to treat and dispose of Wastewater generated by the Undertaking authorized under this Licence until such time that the Upgraded Wastewater Treatment Plant authorized by the Licensee is constructed and commissioned, or as otherwise approved by the Board in writing.	In Compliance									
2	The Licensee shall provide written notice to an Inspector and the Board at least ten (10) days prior to any planned Discharges from the Solid Waste Facility, Sewage Lagoon Facility, Wastewater Treatment Plant, and the Upgraded Wastewater Treatment Plant once commissioned.	In Compliance									
3	The Licensee shall establish the relevant monitoring stations for the facilities authorized under this Licence in accordance with Schedule I.	In Compliance									
4	<p>The Licensee shall ensure that Surface Drainage or surface Water runoff associated with site activities or generated during the construction of any facility designed to withhold, divert, or retain Water or Waste, does not exceed the following Effluent criteria:</p> <table border="1"> <thead> <tr> <th>Parameter</th><th>Maximum Average Concentration</th><th>Maximum concentration of Any Grab Sample</th></tr> </thead> <tbody> <tr> <td>Total Suspended Solids (TSS)</td><td>50.0 mg/L</td><td>100.0 mg/L</td></tr> <tr> <td>pH</td><td colspan="2">Between 6 and 9.</td></tr> </tbody> </table>	Parameter	Maximum Average Concentration	Maximum concentration of Any Grab Sample	Total Suspended Solids (TSS)	50.0 mg/L	100.0 mg/L	pH	Between 6 and 9.		In Compliance
Parameter	Maximum Average Concentration	Maximum concentration of Any Grab Sample									
Total Suspended Solids (TSS)	50.0 mg/L	100.0 mg/L									
pH	Between 6 and 9.										
5	Upon commissioning of the Upgraded Wastewater Treatment Plant, the Sewage Lagoon Facility shall be used as a back-up facility or closed and reclaimed in accordance in Part J, Item 4.	In Compliance									
6	The Licensee shall submit to the Board for approval in writing, within four (4) months of the Effective Date of the Licence, an Operation and Maintenance Manual for the Sewage Lagoon Facility that addresses requirements for both the Sewage Lagoon and Sludge Management Facilities. The manual shall be prepared 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 (GNWT, 1996).	In Compliance									

7	The Licence shall submit to the Board for approval in writing, by December 21, 2018 or as otherwise directed by the Board in writing, an Operations and Maintenance Manual for the Upgraded Wastewater Treatment Plant that incorporates the requirements of Part E, Item 6. The manual shall be prepared 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 (GNWT, 1996).	To be provided on May 1, 2020 with the annual report.
8	The manual referred to in Part E, Item 7 shall supersede the manual referenced in Part E, Item 6, following approval by the Board in writing.	In Compliance
9	The Licensee shall submit to the Board for approval in writing, by December 31, 2018, an updated version of the plan entitled City of Iqaluit Solid Waste Management Plan, dated January 2014 that addresses relevant intervenor's comments and recommendations made during the licensing process, such as inclusion of details related to future uses of the landfill, timeframe for closure, and ongoing activities within the scope of this Licence.	In Compliance
10	The Licensee shall undertake Dam Safety Inspections (DSI) and/or Dam Safety Reviews (DSR) of the Wastewater Treatment Facilities in accordance with requirements of the Canadian Dam Association (CDA), Dam Safety Guidelines (2007, or most current version). The Licensee shall submit for the Board's review, within the Annual Report required under Part B, Item 1, the report generated for the DSIs or DSRs along with the Licensee's recommended actions to address any deficiencies identified in the inspections and/or reviews.	In Compliance
11	The Licensee shall dispose of and contain all municipal solid waste generated by the City at the West 40 Landfill as associated site(s) authorized under this licence or as otherwise approved by the Board in writing.	In Compliance
12	The Licensee shall submit to the Board for approval, within sixty (60) days of the Effective Date of the Licence, an updated Landfill Operation and Maintenance Manual that addresses concerns raised by intervening parties during the licensing process including the following: a. Management of Leachate from the facility; b. Updated sampling and monitoring requirements; and c. Open burning practices. d. Ongoing activities within	In Compliance
13	The Licensee shall collect and contain all leachate generated by the West 40 Landfill within the Landfill.	In Compliance
14	The Licensee shall submit to the Board for review, by December 31, 2017, an updated version of the document entitled West 40 Landfill Drainage Management Review, dated September 16, 2011, that addresses the concerns raised by intervening parties including information on the absence of permafrost related data.	In Compliance
15	The Inspector may authorize an emergency Discharge, following the Licensee's written submission to the Inspector and to the Board, at least fifteen (15) days prior to discharge or as instructed by the Inspector, that includes the following information: a. Proposed quantity of discharge; b. Reason for discharge; c. Identification of the Final Discharge Location; d. Proposed sampling and analysis to be conducted; and e. Proposed mitigation measures to implemented.	In Compliance
16	The Licensee shall submit to the Board and the Inspector for review, within sixty (60) days following any emergency Discharge authorized by the Inspector, a report that includes, among other items, an analysis of results for the emergency Discharge.	In Compliance
17	The Licensee shall maintain the Licensed Facilities to the satisfaction of an Inspector.	In Compliance
18	The Licensee shall remove from the site associated with the undertaking, all Hazardous Wastes, waste oil and non-combustible waste generated through the course of the operation, for disposal at a licensed waste disposal facility.	In Compliance
19	The Licensee shall maintain records of all Waste removed from site and records of confirmation of proper disposal of removed Waste. These records shall be made available to an Inspector or the Board upon request.	In Compliance

Part F CONDITIONS APPLYING TO CONSTRUCTION		
1	The Licensee shall, submit to the Board for review, within thirty (30) days prior to commencing construction of any facilities or infrastructure authorized under this Licence, for-construction designs and drawings, signed and stamped by an Engineer.	In Compliance
2	The Licensee shall ensure that all relevant approved facilities are designed and constructed to engineering standards such that, at a minimum, they comply with the most current version of the Canadian Dam Safety Guidelines.	In Compliance
3	The Licensee shall implement measures to ensure that all materials used in the construction of relevant facilities or infrastructure included under the scope of this Licence are free of contaminants, to the extent that they do not cause harmful or significant effects to Water.	In Compliance
4	The Licensee shall maintain shoreline stability during construction	In Compliance
5	<p>The Licensee shall ensure that all final designs and drawings are qualified by an Engineer confirming that:</p> <ul style="list-style-type: none"> <li>a. Works are designed under sound engineering principles;</li> <li>b. Design limitations are understood and communicated within the report; and</li> <li>c. Measures are implemented to minimize impact to Water.</li> </ul>	In Compliance
6	The Licensee shall, submit to the Board for review, within ninety (90) days of completion of any structure authorized under this licence, to contain, withhold, divert or retain Water or Wastes; a construction summary report prepared by an Engineer that includes, among other relevant information, as-built drawings, documentation of field decisions that deviated from original plans, and any data used to support these decisions.	In Compliance
7	The Licensee shall, if contamination of surface and/or ground water is encountered during construction and excavation, notify the Inspector immediately and implement the Spill Contingency Plan.	In Compliance
8	The Licensee shall develop and implement measures necessary to prevent and mitigate erosion and/or the release of sediment into Water during the construction of the Upgraded Wastewater Treatment Plant or during any construction activities associated with the Undertaking.	In Compliance
Part G CONDITIONS APPLYING TO MODIFICATIONS		
1	<p>The Licensee may, without written consent from the Board, carry out Modifications to the potable Water Treatment Facility and Waste Treatment Facilities provided that such Modifications are consistent with the terms of this Licence and the following requirements are met:</p> <ul style="list-style-type: none"> <li>a. the Licensee has notified the Board in writing of such proposed Modifications at least sixty (60) days prior to beginning the Modifications;</li> <li>b. Such Modifications are consistent with the NPC Land Use Planning (NPC) Conformity Determination and the NIRB Screening Decision;</li> <li>c. such Modifications do not place the Licensee in contravention of the Licence or the Act;</li> <li>d. the Board has not, during the sixty (60) days following notification of the proposed Modifications, informed the Licensee that review of the proposal will require more than sixty (60) days; and</li> <li>e. The Board has not rejected the proposed Modifications.</li> </ul>	In Compliance
2	Modifications for which all of the conditions referred to in Part G, Item 1 have not been met can be carried out only with written approval from the Board.	In Compliance
3	The Licensee shall provide as-built plans and drawings of the Modifications referred to in this Licence within ninety (90) days of completion of the Modifications. These plans and drawings shall be stamped by an Engineer.	In Compliance
Part H CONDITIONS APPLYING TO SPILL CONTINGENCY PLANNING		
1	The Licensee shall, submit to the Board for approval in writing, within thirty (30) days of the Effective Date of this Licence, an amalgamated and updated Spill Contingency Plan. The Plan shall address spill contingency planning requirements for all relevant aspects of works, activities, and undertakings associated with the scope of this Licence including the Sewage Lift Station.	In Compliance
2	<p>The Licensee shall, subject to section 16 of the Regulations, report any unauthorized deposits of Waste or foreseeable unauthorized deposits of waste and/or Discharges of Effluent, and:</p> <ul style="list-style-type: none"> <li>a. Employ, as required, the approved Spill Contingency Plan;</li> <li>b. Report the incident immediately via the NWT/NU 24-Hour Spill Reporting Line (867) 920-8130 and to the Inspector at (867) 975-4295; and</li> <li>c. For each spill occurrence, submit a detailed report to the Inspector, no later than thirty (30) days after initially reporting the event. The report shall include the amount and type of spilled product, the GPS location of the spill, and the measures taken to contain, clean up and restore the spill site.</li> </ul>	In Compliance
3	The Licensee shall, in addition to Part H, Item 2, regardless of the quantity of release of a harmful substance, report to the NWT/NU Spill Line if the release is near or into a Water body.	In Compliance

Part I	CONDITIONS APPLYING TO MONITORING	
1	The Licensee shall monitor the relevant potable Water Treatment Facility and Waste Treatment Facilities authorized under this Licence in accordance with requirements included under Schedule I.	In Compliance
2	The Licensee shall, submit Board for approval in writing, within sixty (60) days of the Effective Date of this Licence, an updated Monitoring Program that addresses monitoring requirements for the Water Treatment Facility and Waste Treatment Facilities. The Monitoring Program shall address, among other items, the requirements outlined in Schedule I.	In Compliance
3	All analyses required under Schedule I shall be conducted using methods as described in the most recent edition of "Standard Methods for the Examination of Water and Wastewater", or by such other methods as approved by the Board in writing.	In Compliance
4	All laboratory analyses shall be performed at a laboratory accredited according to ISO/IEC Standard 17025. The accreditation shall be current and in good standing.	In Compliance
5	The Licensee shall, submit to the Board for review, within sixty (60) days of the Effective Date of the Licence, an updated Quality Assurance/Quality Control (QA/QC) Plan prepared in accordance with Quality Assurance (QA) and Quality Control (QC) Guidelines for Use by Class "A" Licensees in Meeting SNP Requirements and for Submission of a QA/QC Plan (INAC, 1996 or most current version). The updated plan shall be accompanied by a letter from an Analyst of an accredited laboratory confirming acceptability of the Plan.	In Compliance
6	The Licensee shall measure by instrument and record in cubic metres, the monthly quantities of freshwater extracted from the Lake Geraldine Reservoir, at Monitoring Program Station No. IQA-01, used for all purposes under this Licence.	In Compliance
7	The Licensee shall measure, by instrument and record in cubic metres, the quantities of Effluent released from the Sewage Lagoon Facility at Monitoring Station No. IQA-02, Wastewater Treatment Plant and/or Upgraded Wastewater Treatment Plant at Monitoring Station No. IQA-04 and the West 40 Landfill at Monitoring Station No. IQA-08.	In Compliance
8	The Licensee shall measure and record in cubic metres, the monthly and annual volumes of sludge removed from the Wastewater Treatment Facilities.	In Compliance
9	The Licensee shall provide the GPS co-ordinates (in degrees, minutes and seconds of latitude and longitude) of all locations of sources of Water utilized and Waste deposited under this Licence.	In Compliance
10	The Licensee shall include all of the data and information required by the Monitoring Program under Schedule I within the Annual Report required under Part B, Item 1 of the Licence or as otherwise requested by an Inspector and/or the Board.	In Compliance
11	Additional Monitoring may be requested by the Board and/or the Inspector.	In Compliance
12	The Monitoring Program and compliance dates specified in the Licence may be modified at the discretion of the Board in writing and do not constitute an application for Amendment as defined in the Act.	In Compliance
Part J	CONDITIONS APPLYING TO CLOSURE AND RECLAMATION	
1	The Board has accepted the document entitled Iqaluit Solid Waste Management Plan West 40 Landfill Decommissioning Technical Memorandum, dated January 2014, submitted as additional information with the Application.	In Compliance
2	The Licensee shall submit to the Board for approval in writing, at least one (1) year prior to commencing the decommissioning of the West 40 Landfill, a Final Closure and Reclamation Plan prepared by an Engineer in accordance with industry's best practices and relevant guidelines.	In Compliance
3	The Licensee shall, for the Plan required under Part J, Item 2, include a presentation of data and a discussion of environmental conditions existing before the use of the site by the Licensee as a municipal landfill, as well as remediation objectives.	In Compliance
4	The Licensee shall notify the Board in writing, at least one year prior to the implementation of final closure, of its intentions to proceed with final closure of any Water use or Waste disposal facilities included within the scope of this Licence, excluding the Facility under Part J, Item 2.	In Compliance

## Inspector Comments

Item	West 40 Landfill Inspection Comments	Response
1	Part E, Item 11 states; "The Licensee shall dispose of and contain all municipal solid waste generated by the City at the West 40 Landfill as associated site(s) authorized under this license or as otherwise approved by the Board in writing.", Due to the abundance of windblown litter and refuse being pushed outside the facility the licensee is out of compliance with Part E, Item 11. The city is to provide a plan with a schedule for the repairs to the fence and remove the windblown litter surrounding the facility.	The City of Iqaluit will be awarding a contract to construct a containment berm and fence along the western property line of the West 40 Landfill. The berm will provide containment of all run-off along the western perimeter of the landfill. Any retained run-off will be pumped to the approved holding and containment ponds located across Akilli Drive where it is managed as per the Operations Plan and Water License. It is anticipated the contractor will begin construction in June or early July and be complete by the end of October. The management of litter outside of the landfill property is an ongoing maintenance item to be performed by landfill staff.
2	Part E, item 13 states that; "The Licensee shall collect and contain all leachate generated by the West 40 Landfill within the Landfill." During the inspection there was runoff flowing from this facility to the surrounding ditches and the liner of the containment ditches have multiple rips. The Licensee it to provide a plan with a time line for the required repairs in ensuring the facility is containing all leachate.	As identified above a berm is being constructed to contain all run-off within the landfill footprint. Until construction is complete the landfill will deploy absorbent booms to mitigate the potential off-site flow of surface water drainage that may be contaminated with hydrocarbon residue. Over the past year the landfill has provided cover over a significant portion of the landfill to minimize the amount of waste that is in contact with precipitation thereby minimizing leachate production. The landfill is now operating in a manner that controls the amount of exposed waste and is endeavoring to cover waste in a timely manner.
3	Part E, Item 17. States that; "The Licensee shall maintain the Licensed Facilities to the satisfaction of an Inspector." Due to the concerns mentioned in this and previous reports the licensee is out of compliance with Part E, item 13.	See above
4	Part E, Item 18 states that; "The Licensee shall remove from the site associated with the undertaking, all Hazardous Wastes, waste oil and non-combustible waste generated through the course of the operation, for disposal at a licensed waste disposal facility." The licensee is to provide the manifests for all Hazardous wastes shipped from this facility to Licensed waste disposal Facilities.	<p>The landfill does not accept hazardous waste from commercial businesses. The landfill does accept Household Hazardous Waste (HHW) from residential customers. These materials which include paint, batteries, e-waste, empty propane cylinders, waste oil, waste oil filters and scrap tires are separated from the waste stream and stored for either recycling or disposal at a licensed facility. Scrap metal and white goods (appliances) are stored for recycling. The landfill receives end-of-life vehicles which are de-contaminated and place in the scrap metal area for recycling. Any waste fluids are captured stored and shipped off site. Waste gas, diesel and oils are sent off site to business that burn the material in waste oil fired heaters. This material is not manifested. Anti-freeze is captured and sent to recyclers</p> <p>The City of Iqaluit has a contract to remove all stored recyclables, (paint, e-waste, tires, batteries) off site and ship to recyclers this year. The City also has a contract in place to removed scrap metal off-site this summer. The City has contracted with QE to address the number of drums on site that contain unidentified liquids. This material will be removed this summer.</p> <p>Manifests for the removal of the hazardous waste and hazardous recyclables will be provided when available as requested.</p>
5	In the response you state that a containment berm will be installed and used to hold waste water prior to being pumped to the containment ponds across the street, will this containment berm be lined? Has the City complied with the Conditions in Part G: Conditions applying to Modifications, of the water licence?	There is no plan to line the containment berm. It will be constructed of compacted material. The City was required to provide the Water Board with an updated Operations Manual and that manual had to address the surface water management system. The Manual Clause 11 provides that a perimeter berm is being constructed in 2019 to retain run-off along the west perimeter of the landfill. It is our understanding with their approval of the Operations Manual, and in light of their specific questions regarding surface water management, that part G is satisfied as this is not a modification but an approved condition. We will provide a letter to the Water Board advising that construction of the berm is to occur this summer. Please see the attached drawings showing the location of the berm.

6	<p>b) Limiting the presence of hydrocarbons in the leachate would not bring the city into compliance with Part E, Item 13 of the Licence. Is the Licensee removing the containment ponds at the South end of the facility? Has approval been granted by the NWB? How does the City plan on Collecting and containing all leachate from this facility?</p>	<p>We agree limiting hydrocarbons from the leachate does not bring compliance. No ponds will be removed at the south end of the facility. The construction of the berm along the west property line will in fact create two small containment ponds. These ponds will be pumped into the main containment pond along the east and south perimeter of the landfill and then to the holding ponds across the road. The containment berm along with the holding ponds on the east and south side are intended to contain all waste contact water and leachate. This water is pumped across Akilliq Drive to the retention ponds. Operation of the surface water system is detailed in the approved operation manual. (Clause 11).</p>
7	<p>Part F, Item 1 states that; "The Licensee shall, submit to the Board for review, within thirty (30) days prior to commencing construction of any facilities or infrastructure authorized under this Licence, for-construction designs and drawings, signed and stamped by an Engineer." It does not appear that these drawings are stamped or signed by an Engineer.</p> <p>Also, how does the city plan on managing the runoff on the east side of the facility? With the lack of ponds and ditches I am uncertain how this water will be captured or contained within the facility.</p>	<p>The existing landfill development contains a retention berm along the east and south perimeter of the landfill as well as retention provided by the bedrock surface to the north. (see attached picture) The top surface of the landfill is graded and sloped to direct all run-off along the east side of the landfill to flow into this retention pond along with additional run-off that will be collected along the west perimeter and pumped into this pond. No additional ditches are required as all contact water is contained within this constructed berm. On an annual, as needed basis, this retained run-off is pumped to the retention and storage ponds across Akilliq Drive. Please refer to Figure 1 in Appendix L of the Operations Manual and Section 11 Surface Water Management, of the Operations Manual.</p>