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DIAND Nunavut District
Box 100
Iqaluit, NT
XOA OHO

Your file Votre référence

Our file Notre référence

May 30, 1996

B9545-5-N5L4-0087

Mr. John Raycroft
Senior Administrative Officer
Town of Iqaluit
Box 460
Iqaluit, NT
XOA OHO

JUN 11 1996

0087
WB

Dear Mr. Raycroft;

1995 Compliance Report - Water Licence N5L4-0087
Town of Iqaluit - Iqaluit, NT

1. Please find attached a copy of the 1995 Compliance Report prepared to determine how the Licensee has performed compared to the terms and conditions contained within the Water Licence N5L4-0087.
2. The Licensee has failed to meet many of the required terms and conditions of this Licence. These deficiencies relate primarily to Surveillance Network Program requirements. See paragraph 34 of the attached report for further explanations.
3. Please reply, in writing, how these deficiencies noted in this report are to be addressed. Should you require any clarification regarding any aspects of the 1995 Compliance Report, please do not hesitate to contact the DIAND Nunavut District Office at 979-4405.

Sincerely,

Paul Smith
Water Resources Officer
Nunavut District

cc. - Municipal Coordinator, Water Resources Division, Yellowknife
- Nunavut Water Board Transition Team, Gjoa Haven

Canada

1995 COMPLIANCE REPORT

ON

CONDITIONS OF LICENCE NUMBER N5L4-0087

HELD BY THE TOWN OF IQALUIT

PREPARED BY

PAUL SMITH

INSPECTOR UNDER THE NORTHWEST TERRITORIES WATERS ACT

DIAND NWT REGION

NUNAVUT DISTRICT

IQALUIT, NT

DATE: May 21, 1995

WATER REGISTER: N5L4-0087

Town of Iqaluit
Water Licence N5L4-0087
1995 Compliance Report

1. On January 1, 1991, the NWT Water Board renewed the Town of Iqaluit's Water Licence. This Licence expired on December 31, 1995 and was not renewed by the NWT Water Board until February 23, 1996. This will be the last compliance report written for this licence. The Licensee is permitted to use 1,100,000 cubic metres of water per year.

Compliance

Part A - General Conditions

2. (Item 3). The Licensee has not strictly complied with this section. The Annual Report was required to be submitted on or before March 1, 1995. The Licensee submitted their Annual Report on March 31, 1996. Due to circumstances beyond their control, the Town was without a Licence until February 23, 1996 and indicated in their cover letter accompanying the Annual Report that their submission was being based on the new licence (which requires the Annual Report to be submitted by March 31st).

3. (Item 3a). This condition has been met. The Licensee has submitted monthly and annual water use records. A correction required should be noted: the Licensee has reported total water consumption to have been 4.1 million litres (4100 cubic metres). This value would appear to be two orders of magnitude below historic water consumption levels.

4. (Item 3b). This condition has not been met. In the past, the Licensee has assumed that sewage generation equals water consumption, but as noted above, the Licensee has written their Annual Report based on their renewed licence (which does not have this requirement).

5. (Item 3c). The Licensee has complied with these conditions.

6. (Item 3d). The Licensee has complied with this section by providing a summary of A+R work completed in 1995 and what plans are in place for 1996.

7. (Item 3e). The Licensee has complied with this section by providing a summary of studies completed in 1995 and what future studies are planned.

8. (Item 3f). The Licensee has not submitted all data required under the Surveillance Network Program. This is in part due to the Licensee's decision to write the Annual Report based on the renewed licence which has slightly different reporting requirements. Deficiencies will be discussed within the SNP section below.

9. (Item 3g). The Licensee has provided a list of all spills that occurred within Municipal boundaries in 1995. Omitted from this list are Spills 95-018, -049, -092, -093, -129, -179, -186 and -201.
10. (Item 3h). The Licensee was not requested to provide any other information. The Licensee is in compliance with this section.
11. (Item 5). Deficiencies noted with the 1995 Annual Report will be discussed below under the SNP portion of this compliance report.
12. (Item 7). The Licensee does not currently use any metering methods (other than the knowledge of the amount of water produced) to determine the amount of wastes entering the sewage lagoon. The Licensee will be making significant changes to their waste disposal practices in the upcoming years and the renewed licence does not require that such volumes are determined.
13. (Item 8). The Licensee has complied with this section. SNP Station signs have been placed accordingly.
14. (Item 9). According to this clause, the Licensee must provide a detailed report of all spills which are reported to or observed by the Licensee within 30 days of the spill being detected. One interpretation of this clause could be this applies to spills which are not the responsibility of the Licensee and for which they may have no working knowledge of the systems involved nor responsibility for (eg. fuel spill on tarmac of airport as a result of refuelling an aircraft). It should be noted that the renewed licence does not have this requirement. The District is interpreting this clause such that detailed reports of spills within the municipal boundaries are only expected from the Licensee for spills over which they had responsibility. The Licensee was only required to provide a detailed report on the one spill that they were responsible for (95-009). The Licensee did not submit this report.

Part B - Conditions Applying to Water Supply

15. (Item 1). The Licensee obtained all water from Lake Geraldine. The Licensee is in compliance with this section.
16. (Item 2). The permitted amount of water to be used is 800,000 cubic metres per year. The Licensee used in excess of 401,000 cubic metres of water. The exact amount is not provided due to the error identified in para. 3. In any case, the Licensee is within their allotted amount.

Part C - Conditions Applying to Waste Disposal

17. (item 1). The Licensee is in compliance with this section.
18. (Item 2). The Licensee met the effluent discharge requirements during open water periods for the parameters of BOD, TSS and pH. Total coliform levels are suspect for the samples collected in August (15th and 29th) and October (17th) as the Licensee reported results at "< 1600". The Analytical sheets directly from NovaMann International report these results as "> 1600". Either way, the results (through transcription error or analytical reporting) are inaccurate enough to not meet this reporting requirement. A sample collected by the Inspector on August 8, 1995 had a Fecal Coliform value of 340,000 CFU/dL. The licence limit was 200,000 CFU/dL. The Licensee had exceeded their limit by 60%. With the renewed licence, this limit has been increased to 1,000,000 CFU/dL.
19. (Item 3). The Licensee has complied with this section. It is no longer applicable.
20. (Item 5). No longer applicable. The Licensee has complied with this section.
21. (Item 6). No longer applicable. The Licensee has an approved O+M plan in place.
22. (Item 8). No longer applicable. A new site is now operational.
23. (Item 10). Within the new licence, the Licensee is given until January 1, 1997 to submit a long-term waste management plan. The Licensee was to have produced this report during the term of the now-expired Licence, but was unable to do so. While the Licensee did not request an extension, the fact that the Board has given the Licensee an extension, it would serve little purpose in judging compliance on this issue.
24. (Item 12). The Licensee has complied with this section. There were no spills associated with the waste disposal systems.

Part D - Conditions Applying to Modifications

25. (Item 1). The Licensee has not made modifications to the waste disposal facilities. Therefore, no approval was required from the Board.

Surveillance Network Program

Part B - Sampling and Analysis Requirements

26. (Item 1). The Licensee has not complied with this section. No samples were collected in the months of July and September, although the Licensee did collect two samples in August. Samples collected, during periods of flow, from SNP Station 0087-2 were within licence limits. As noted in para. 18 above, the Licensee also appears to have sample preservation problems as Fecal coliform levels are very low. This may be the result of excessive handling/transportation times.

27. (Item 2). The Licensee has not complied with this section. No analysis of samples from SNP Station 0087-4 are provided and only 2 samples (June and August) are provided for SNP Station 0087-5. From the June sample, no iron is analysed for. August sampling parameters were met.

28. (Item 3). The Licensee is using the services of NovaMann International for their laboratory services (received approval per SNP Part B, Item 4 on January 9, 1996).

Part C - Flow Measurement Requirements

29. (Item 1). The Licensee has complied with this section.

30. (Item 2). The Licensee uses water generation records to determine flow volumes at SNP Station 0087-3, although they have not provided this information for reasons discussed in para.2 and 12. For the purposes of this compliance report, the Licensee has failed to comply with this section.

31. (Item 3). The Licensee is to maintain daily records of the level of sewage in the lagoon. The Licensee failed to submit this information in the Annual Report, although it is submitted (incompletely) in the amended October 10, 1995 resubmission. The Licensee is not in compliance with this section.

32. (Item 4). The Licensee is to estimate the rates of seepage from the lagoon and record this information on a weekly basis. The Licensee failed to submit this information in the Annual Report, although they submitted some information in the amended October 10, 1995 resubmission. The Licensee is not in compliance with this section.

Part D - Reports

33. (Item 1). The Licensee made two submissions under this section (June; submitted July 7, August; submitted on September 18) although they were not submitted in tabular form as required by the licence. The Licensee resubmitted this information in tabular form on October 10, 1995. The Licensee is required to make 12 monthly submissions, but has submitted only two. Therefore, the Licensee is not in compliance with this section. The renewed water licence does not require a monthly submission of SNP data.

Conclusion

34. The Licensee has failed to comply with their licence on a number of points. The deficiencies noted are:

- a. Late submission of Annual Report. See para. 2 for details.
- b. A mathematical or transcription error is suspected for inaccurate reporting of the total water consumption. See paras. 3+16 for details.
- c. The Licensee has not provided information relating to the total volume of waste discharged from the sewage lagoon. See paras. 4+12 for more details.
- d. The Licensee has not submitted or met all of the SNP information required. See paras. 8, 26, 27, 30, 31, 32 and 33 for complete details.
- e. An incomplete listing of unauthorized discharges was provided and no detailed report was submitted for spill 95-009. See paras. 9+14 for more details.
- f. The Licensee has failed to meet effluent discharge parameters. See para. 18 for details.



Paul Smith
Water Resources Officer
Nunavut District