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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

NWB File No: 3BM- PAN0810/Technical

April 24, 2014

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Re: 3BM-PAN0810: Response to additional information provided for the Renewal Application from the Government of Nunavut – Community and Government Services (GN-CGS) for the Hamlet of Pangnirtung’s Type “B” Water Licence

Dear Mr. Roy:

The Nunavut Water Board (NWB or Board) has received from the Government of Nunavut, Community and Government Services (GN-CGS) the following documents in support of an application filed for the renewal of Type “B” Water Licence 3BM-PAN0811, issued to the Hamlet of Pangnirtung:

April 3, 2014 Submission

- Authorization Letter;
- Design Development Report – Optimization of Drinking Water Supply Pangnirtung, Nunavut GN-CGS Project #08-2009; and
- Letter from B. Roy, GN-CGS to P. Beaulieu, NWB, *RE: Hamlet of Pangnirtun: Water License #3BM-PAN0810 Application*, dated April 08, 2014.

After review of the above mentioned, the application is still considered incomplete and cannot continue in the application process. The information in the letter¹ provides little clarification and only restates

¹ Letter from B. Roy, GN-CGS to P. Beaulieu, NWB, *RE: Hamlet of Pangnirtun: Water License #3BM-PAN0810 Application*, dated April 08, 2014.

information that was considered deficient with the original application. The information provided lacks any tangible commitments or implementation schedule for any outstanding requirements.

1.0 Plan for compliance

As per Part B, Item 10 of the expired Licence, the Licensee must submit a Plan for Compliance that clearly demonstrates how the Hamlet will achieve full compliance, including an implementation schedule, to achieve full compliance with the conditions of this Licence.

Your responses to clarify from the preliminary technical review to submit plans include:

“We are running three Capital Projects in this community and the status is as follows”

- Although three (3) Capital projects are running in the community, it does not exclude the requirement to provide a plan for compliance for approval. The plan for compliance and accompanying information lack details and a clear implementation schedule on how and when the Licensee plans to come into full compliance.

2.0 Operational Plans

2.1 Wastewater Treatment Plant (WWTP)

Your responses to clarify concerns from the preliminary technical review include:

“The construction for optimization of this plant was started in 2013 and expected to be completed in 2014. The existing O&M manual will only be revised and updated once entire construction is complete sometime at the end of 2014. The design consultant is exp Services Inc. and the contractor is Kudlik Construction Ltd.”

“The existing Manuals for WWTP and WTFS are still unchanged. No modification was made until entire construction of both facilities are complete”

“Wastewater Treatment Plant (WWTP) O&M manual: - The Revised manual along with the as built drawings will be available at the end of 2014.”

An O&M Manual for the existing WWTP is required to be submitted and approved by the board, Under Part F, item 1. If existing manuals are available, they were to have been provided to the board by November 2008 and updated accordingly with any changes in operations and or technology, as required under Part F, Item 2.

- It should be understood that *existing Manuals for WWTP and WTFS* were never submitted to the Board. Please provide existing manuals or if updated manuals are expected shortly, please submit new manuals, along with all outstanding information in a complete and comprehensive package.

2.1.1 Sewage Sludge and Screenings & Fish Process Plant Waste Management Plans

Your responses to clarify concerns from the preliminary technical review include:

“This was addressed in the design for WWTP optimization and activated soon after construction is complete”.

“The fish waste is being transported to the dump site, open dried, compacted and buried; whereas; fish liquid is being dumped into the existing lagoon and this will be dumped in the WWTP once its optimization is complete.”

- The Purpose of the O&M manual is to assist Hamlet staff in carrying out the procedures for operating and maintaining infrastructure and facilities relating to Water distribution and waste disposal.
- The Plan for managing sewage sludge and screenings was a condition of the previous license and was never fulfilled. The NWB understanding is that even with the WWTP optimization a bi-product (sludge) will be produced and needs to be handled accordingly.
- A Fish Process Plant Waste Management Plan will still be required to insure proper handling and disposal of fish waste.

2.2 Water Truck Fill Station (WTFS)

Your responses to clarify concerns from the preliminary technical review include:

“Design and Tender document for the new Water Truck Fill station (WTFS) are ready. We are expecting to start construction this summer and hoping to complete in 2016. The new O&M manual will be made available in 2016 prior to commissioning this new facility. The design consultant is Arktis Solution Inc.”

“The existing Manuals for WWTP and WTFS are still unchanged. No modification was made Until entire construction of both facilities are complete.”

As stated above in the s.2.1 an O&M Manual for the existing WTFS was required to be submitted and approved by the board, Under Part F, item 1. If existing manuals are available, they were to have been provided to the board by November 2008 and updated accordingly with any changes in operations and or technology, as required under Part F, Item 2.

- Please provide existing manuals or if updated manuals are expected shortly, please submit a new manual, along with all outstanding information in a complete and comprehensive package.

2.3 Solid Waste Disposal Facility

Your responses to clarify concerns from the preliminary technical review include:

“The O&M manual for the new facility will be available once construction is complete and commissioned. No O&M manual is existing for the existing dump site. No plan is developed yet for abandonment and restoration of the existing site until and unless the new site is built and commissioned.”

“Solid waste Disposal facility Operation and Maintenance (O&M) Plan: - We create a generic O&M Plan for current MSW site sometime in early 2015”

- An O&M Manual for the existing WTFS was required to be submitted and approved by the board, Under Part F, item 1. Any changes in operations and or technology can be submitted in the form of an addendum, as required under Part F, Item 2.

2.4 Spill Contingency Plan & Monitoring Program QA/QC Plan

Your responses to clarify concerns from the preliminary technical review include:

“This is the part of the O&M of WWTP and will also be the part of the O&M of new Solid Waste Facility. This will be available once those manuals will be available; O&M for WWTP is expected in 2014 and O&M for waste facility is expected in 2017/18.”

- The above mentioned plans should be developed for all existing facilities and infrastructure, where applicable, and updated accordingly with any changes in operations and or technology and submitted in the form of an addendum, as required under Part F, Item 2.

3.0 Abandonment & Restoration

To ensure that all existing end-of-life facilities are reclaimed in an appropriate manner, the NWB requires Licensees to submit an *Abandonment and Restoration Plan*. This Plan is to be submitted at least six (6) months prior to final closure of any licensed facility or upon submission of the final design drawings for the construction of new facilities to replace existing ones. The requirements for the Plan are outlined in Part G, Item 1 of this Licence.

Your responses to clarify concerns from the preliminary technical review include:

“Part B, Item 1(f): No abandonment and restoration work was planned and no such work was completed.”

“Clarification of Part G, item (2):

(a): Solid waste facility: - The Capital Project is on hold.

(b): Water Intake Facilities:- Design development document and construction drawings are attached.

(c): The Water Treatment Plant Facility:- Design development and construction drawings are attached. Waste disposal facility (WWTP):- The construction is in Progress.”

Note: (Responses were provided for D through M)

- No responses provided regarding the A&R plan for Old pump station as required under Part G, item 1
- Part G, item 2 requires Abandonment and Restoration Plan (A&R plan), the response provided does not constitute as a plan and it is not evident if a plan will be produced to meet requirement.
- The Licensee is advised that an A&R Plan will be required for old Sewage Lagoon, and Solid Waste Facility. This(ese) Plan(s) is(are) to be submitted at least six (6) months prior to final closure of any licensed facility or upon submission of the final design drawings for the construction of new facilities to replace existing one, as per Part G, item 2.

4.0 Other

Your responses to clarify concerns from the preliminary technical review include:

“Toxicity test was not done. We are recommending deleting the item 3 (a and b) of Part D of the water licence due to constraints of sampling, shipping and testing in the South lab.”

- The NWB required acute toxicity testing as a license condition as a requirement from Environment Canada that any effluent discharged must be in compliance with Section 36(3) of the Fisheries Act. If an amendment to the Licence is requested, the Licensee should provide a rational for the exclusion of that condition, logistical constraints are not an acceptable rational. Please include any supplementary or supporting documentation if applicable.
- Part F, item 3, an inspection of all engineered facilities related to the management of water and waste shall be carried out annually in July or August by a Geotechnical Engineer. The plan of compliance on file states:

“Hamlet is inspecting the water Licensed facilities on regular basis. CGS Municipal Engineer is inspection on annual bases”

This is consistent with discussion that NWB staff and GN-CGS had in April 2013 to possibly exclude the mandatory annual geotechnical inspection. However, if the Licence requires an amendment, the Licensee is still required to send a request to the NWB with a rational and possible recommendations and suggestions for the future requirement.

The Licensee is advised that following receipt of the above mentioned additional information on April 8, 2014, the NWB assessed the information and has concluded that the water licence renewal application does not still meet the requirements of section 48(1) of the Nunavut Waters and Nunavut Surface Rights Tribunal Act (“Act”). To ensure this application is dealt with in a timely fashion, please submit all outstanding documentation in a complete and comprehensive package and provide clarifications on issues raised. This information is required for the application to be considered complete and continue with the renewal process. If unable to provide, then in the interim, a Plan for Compliance must be submitted that clearly demonstrates the measures the Licensee will undertake, including long/short term implementation schedules, to achieve full compliance with the conditions of this Licence, including the issues raised in the AANDC Inspector’s Reports.

If you have any further questions please don’t hesitate to contact me at your earliest convenience.

Regards,

Original Signed by;

Erik Skiby
Assistant Technical Advisor
Nunavut Water Board

cc. Ralph Ruediger, Director, Community Development;
Timoon Toonoo, Regional Director;

Bill Westwell, Senior Manager Municipal Planning, Capital Planning;
Wayne Thistle, Senior Manager Project & Asset Management; and
David Hohnstein, Director of Technical Services, Nunavut Water Board.