



NWB Tools

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3AM-PAN1828 Management Plans submission

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Tue, Jul 17, 2018 at 3:06 PM

To: "Roy, Bhabesh" <BRoy@gov.nu.ca>

Cc: Licensing Department <licensing@nwb-oen.ca>

Hi Bhabesh,

I have tried phoning but could not reach you.

Since the updates to the Plans are still required to make sure that they fulfill the Licence conditions, we would like to recommend that the Hamlet withdraws the submission of these Plans. This is especially in regards to the Drainage Plan, as, in its final form, it should satisfy the following:

- as outlined in **3AM-PAN1828 Reasons for Decision:**

Waste Management

INAC considered the issue of the additional processing of waste from the fish processing plant by the Hamlet to be resolved, as only a small amount of fish waste is now being placed in the landfill. However, the issue of the drainage of runoff and seeps from the metal and hazardous waste storage area was identified as an issue that remains open. INAC identified their concern that contaminants originating from metal and hazardous waste should be contained in order to prevent contaminants from entering the environment. INAC recommended that the NWB develop criteria for leachate and runoff from the metal and hazardous waste areas to be included in the new Type "A" Water Licence, and would like to see the existing monitoring stations PAN-4, PAN-5 and PAN-6 converted into compliance points.

As a result of discussion between the Applicant, INAC and NWB staff at the Public Hearing, the Applicant committed to complete in 2018 more extensive monitoring of runoff and seeps from the waste management facility at monitoring stations PAN-4, PAN-5 and PAN-6 and to complete a stand-alone Drainage / Seepage Monitoring and Management Plan²⁴ for the submission to the Board within the 2018 Annual Report. This document should also include an analysis of the parameters of concern and specify target concentration limits for these parameters²⁵.

A topographical survey will also be required to determine drainage patterns. The Applicant indicated that the survey will be conducted in the summer of 2018 and a topographical map highlighting all infrastructure/facilities will be included within the updated Spill Contingency Plan for submission for Board review within the 2018 Annual Report.

Management Plans

Finally, INAC commented on a number of necessary updates to the Water Reservoir Operations and Maintenance Manual, Wastewater Treatment Plant Bypass Contingency Plan, Spill Contingency Plan, and the Quality Assurance/Quality Control Plan. While the

²³ I. Parsons, INAC, NWB Public Hearing, File No. 3AM-PAN----, Transcript, March 21, 2018, Volume 1, p. 77.

²⁴ I. Parsons, INAC, NWB Public Hearing, File No. 3AM-PAN----, Transcript, March 21, 2018, Volume 1, p. 109.

²⁵ I. Parsons, INAC, NWB Public Hearing, File No. 3AM-PAN----, Transcript, March 21, 2018, Volume 1, p. 106.

- as outlined in the Licence Part E, Item 9:

9. The Licensee shall submit to the Board, for approval, a standalone Drainage / Seepage Monitoring and Management Plan with the 2018 Annual Report to address intervener's comments and recommendations made during the 2017-2018 licensing process and public hearing, including, at a minimum, a list of parameters of concern, targeted concentrations limits and monitoring details.

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