

Richard Dwyer <richard.dwyer@nwb-oen.ca>

3AM-PAN1828 Management Plans submission

Roy, Bhabesh <BRoy@gov.nu.ca>

Tue, Jul 17, 2018 at 7:01 PM

To: Assol Kubeisinova <assol.kubeisinova@nwb-oen.ca> Cc: Licensing Department < licensing@nwb-oen.ca>

Hi Assol,

We are now working on these issues step by step. Today they sampled from station 4,5 and 6. Sometimes no surface flow occurs. We have to work on the situation. This licence is now under INAC enforcement officer's direction. We are planning for a joint inspection early next month. We will update as we go.

Thanks.

Bhabesh

From: Assol Kubeisinova [assol.kubeisinova@nwb-oen.ca]

Sent: July 17, 2018 5:06 PM

To: Roy, Bhabesh

Cc: Licensing Department

Subject: Re: 3AM-PAN1828 Management Plans submission

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. 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

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NUNAVUT WATER BOARD | Type "A" Water Licence No. 3AM-PAN1828 Reasons for Decision, Including Record of Proceedings

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

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

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

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

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 minium, a list of parameters of concern, targeted concentrations limits and monitoring details.

As you know, there is still ample time to update the Plans until the submission of the 2018 annual report.

Regards,

Assol



Assol Kubeisinova- ついているはいる

Technical Advisor - Conseiller technique Λοσθο Φοσο Δος Δοςθη-Piluagnagtuliginigmun Ikayugti

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Ameri de penser à l'environnement avant d'imprimer ce courriel / Thank you for thinking of the environment before printing this email

On Wed, Jul 11, 2018 at 8:44 PM, Roy, Bhabesh <BRoy@gov.nu.ca> wrote:

I am still on duty travel. Please see my response in red.

Thanks.

Bhabesh

From: Assol Kubeisinova [assol.kubeisinova@nwb-oen.ca]

Sent: July 11, 2018 6:37 PM

To: Roy, Bhabesh

Cc: Licensing Department

Subject: 3AM-PAN1828 Management Plans submission

Good evening Bhabesh,

Thank you for providing the Plans for 3AM-PAN1828. Could you please update the Plans with the following points:

• inclusion of more detailed information on the Rainbow Trout toxicity testing (such as obtaining effluent samples, control/dilution water choice) in the QA/QC plan;

Ans. Some special labs normally do this kind of testing. Once we identify a Lab soon, we will receive a Lab Chain of Custody sheet which will be part of the QA/QC Plan.

• including the requirement for a fish screen at water intake in the Water Reservoir O&M plan (the current version has a conditional requirement, but the presence of fish has not yet been determined);

Ans. We need to determine the type of fish based on local Knowledge since no fish study was done at the past. Probably a Fish study could be recommended along with the proposed future hydraulic/Hydrology study of the River. We are discussing this issue internally right now.

• as for the Drainage Plan, would you consider postponing its submission until the results of the 2018 sampling campaign as agreed at the public hearing are available and interpreted? This is in line with Licence Part D, Item 4. In that case, the Hamlet will have all necessary information to fulfill the requirement.

Ans. The Drainage plan will stand as it is. We are leachate sampling this summer and lab results will be submitted along with the 2018 annual report with necessary clarification.

Regards,