From: <u>Erik Skiby</u>

To: GN-CGS Bhabesh Roy (Broy@GOV.NU.CA)

Cc: Phyllis Beaulieu; Licensing Administrator

Subject: Preliminary Technical Review 3BM-RUT1012

Date: Tuesday, August 27, 2013 4:48:37 PM

Attachments: <u>image002.png</u>

image001.png

Hi Bhabesh.

Thank for the additional information submitted on February 11, 2013, as a response to missing information requirements for the renewal of 3BM-RUT1012.

The review of the material provided indicates that additional information would be required for a complete application allowing the Board to further process the application. Please see details below.

Part C, item 4. Report: Assessment for the potential for Char Lake to Be Drawn Down

The Char Lake assessment Report was requested by the Board and under part C, Item 4 of the water license 3BM-RUT1012 in response to the increase of water use from 65, 000 to 126, 020 cubic metres per year (345.26 cubic metres per day). The Report was to be submitted for approval within one year of the issuance of the license.

The Report must assess the potential for Char Lake to be drawn down, if the assessment concludes that water may be drawn down, the report shall also include:

- Hydrological Overview of Char Lake;
- Evaluation of impacts on Char Lake;
- Assessment of Sustainability of Char Lake as a long term water sources
- Recommendations to address impacts and long term sustainability; and
- Schedule to implement the recommendations.

With Respect to the report from January 28 to February 03, 2013 provided as a reference from the Contractor ATCO: this report and information provided do not address the concerns or Criteria listed above.

Part D, Item 4. Site Specific study for the determination of fecal coliform limit for sewage Disposal Facility.

A Study for the determination of fecal Coliform Limit for Sewage Disposal Facility Effluent that maintains the quality of the receiving water within reasonable and acceptable limits was requested by the Board under Part D, item 4 of the License. The Study is to take into consideration the receiving water quality objectives provided in the Guidelines for the Discharge of Treated Municipal Wastewater in the Northwest Territories, 1992. The report shall also provide recommended fecal coliform limits for the inclusion in the licence.

In review of the sampling results provided from the extended sampling and testing program from 2012, it is unclear what the results are trying to show, and no recommendation was provided for fecal coliform limits for the inclusion in the licence. Could an explanation and further clarification behind the test results be provided? The study was requested because there were concerns that Resolute Bay may not be well flushed and is used by the community for recreational purposes.

Part F, Item 1. Operations & Maintenance Manual for the Water Supply Facilities, Utilidor and Sewage Disposal Facility.

The Licensee required to submit to the Board for approval within ninety (90) days, an Operations & Maintenance Manual for the Water Supply Facilities, Utilidor and Sewage Disposal Facility. The O&M Manual shall also include the Quality Assurance /Quality Control (QA/QC) Plan required under Part H, Item 7 and a Spill Contingency Plan.

Also required Under Part G, item 1 the Licensee shall, at least six (6) months prior to abandoning any facilities or upon submission of final design drawings for the construction of new facilities to replace existing ones, submit to the Board, for approval in writing, an Abandonment and Restoration Plan for the facilities being decommissioned.

Your responses to requests made from the preliminary technical review to submit plans included:

"CGS is not presenting the old O&M manual Once Design is completed for the entire Utilidor system and the new WWTP, a new O&M manual will be submitted to NWB for approval"

"exp will prepare QA/QC plan and get approved by Caduceon prior to include in the new O&M manual of the new Wastewater Treatment Plant and the optimized Utilidor system. This document will be submitted to NWB prior to commissioning. This process is in progress right now.

"EXP Services INC., will also prepare the Abandonment and Restoration Plan for Airport Sewage Lagoon and any part of the Utilidor system recommended to be abandoned."

In review of the additional information submitted, the application is considered materially incomplete. Please see below a summary of key points which will require additional information before the application can be considered complete and continue in the licensing process.

- ➤ The report for Char Lake and study for fecal coliform limit for sewage Disposal Facility do not address the concerns or requirements and/ or further clarification is to be provided.
- ➤ Ideally outstanding plans required under the license shall be submitted, if unable to provide, then an update to the status of each plan and a schedule that clearly demonstrates how and when GN-CGS will submit plans.
- An older application was submitted with the renewal of the License, the Board has a newer application form available and request that a new application form be filled out and submitted.

The above mentioned requirements are 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 an implementation schedule, to achieve full compliance with the conditions of this Licence, including the issues raised in the Inspector's Reports.

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

Erik

Erik Skiby Assistant Technical Advisor

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