



3AM-RUT Application follow up

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

Cc: Karén Kharatyan <karen.kharatyan@nwb-oen.ca>, Richard Dwyer <richard.dwyer@nwb-oen.ca>

Hi Bhabesh,

Just wanted to follow up on the "Type A" Application you submitted for 3BM-RUT1520 and request some clarifications.

1. The construction timelines provided in the Executive Summary contradict with those provided in the Compliance Table and the 2019 Annual Report. It states that the Pump Station and WTP construction will be completed in 2020 and the WWTP will be commissioned in 2024, as opposed to 2021 (PS/WTP) and 2022 (WWTP) referenced in the Compliance Table and Annual Report. This needs to be fixed to eliminate confusion of the interveners.
2. As per the Compliance Table, the water volumes are recorded through the flow meter, but the Annual Report shows the "On Tap Water Delivery System" volumes. Do the reported volumes include the bleed water or this is just the water trucked to the houses? if yes, what is the total volume pumped out?
3. As per the Compliance Table the hydrology study required under **Part C, Item 4** was previously submitted to the Bord. I cannot locate it within your previous submissions. Could you please resubmit?
4. Same goes for the site specific Coliform Study required under **Part D, Item 4**. I cannot locate any Study that determines the *"fecal coliform limit for Sewage Disposal Facility Effluent that maintains the quality of the receiving waters within reasonable and acceptable limits"*. There is a letter provided by exp. on June 17, 2014, but this is hardly a Study and it was prior to the 2015 Licence issuance. Could you please resubmit this Study as your Compliance Table states *'in compliance'* for that item?
5. O&M Plans for Water Supply Facility and Utilidor required under **Part F** seem to be missing/ incomplete. The document "O&M-WATER SEWER RESOLUTE BAY" provided within the Application Package does not have any text or as-builts included, just a compilation of technical documentation on all sorts of buttons and pipes. Could you please provide a functional plan that an operator can follow?
6. The Board understand that the O&M Plan for the WWTP will be ready in 2022. However, the Application Package will be "stronger" if some conceptual drawings were provided for this facility at this stage. Additionally, it would be beneficial to provide a brief description of the anticipated WWTP construction to the NIRB, so that we are all on the same page.
7. Spill Contingency Plan required under **Part F, Item 1d** has not been provided to the Board to date. The Compliance Table shows "in compliance" and states that some template was submitted earlier. Could you please resubmit?
8. QA/QC Plan required under **Part H, Item 9** is also missing, even though you indicated "in compliance". You are stating that the QA/QC Plan prepared by the Caduceon Environmental Laboratories in Ottawa is being followed, however, the Board has no record of receiving this Plan to date.
9. There is no Abandonment and Restoration Plan required under **Part F** on file either. This should be provided to the Board within the Application Package, so that the interveners do not ask for this submission during the review. For example, the "Blue Building" is no longer in use and will have to be demolished - this needs to be addressed in the plan.
10. As per CIRNA inspector's report the following plans should be developed and submitted to the Board:
 - Plan to address the breach of subsection 4(1) of the *Arctic Waters Pollution Prevention Act*, and
 - Plan to address the breach of subsection 5 of the *Arctic Waters Pollution Prevention Regulation*.

Could you please submit these documents as part of the application package?

Additionally, I would like to note that a "Type A" Application Package should include all required/ referenced documents within the package itself to make it easier for the interveners to go over the documents during the review. When the documents are scattered all over the directory, it make it nearly impossible for the public to review such application.

Let me know if you have any questions.

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