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File: 3BM-ARC0810 / F,1

August 10, 2012

Mr. Bhabesh Roy Municipal Planning Engineer Community Government Services Baffin Region, Government of Nunavut P.O. Box 379, Pond Inlet X0A 0S0

Email: broy@gov.nu.ca;

Joeli Qamanirq Senior Administrative Officer Hamlet of Arctic Bay P.O. Box 144 Arctic Bay X0A 0A0

Email: sao\_ab@qiniq.com

Subject: Water Licence 3BM-ARC0810 – Submission of the "Operations and Maintenance

Manual - Arctic Bay Waste Water Facility"

Dear Mr. Roy and Mr. Qamanirq:

The Nunavut Water Board ("NWB" or "Board") acknowledges receipt of an Operations and Maintenance (O&M) Manual for the Hamlet of Arctic Bay's Wastewater Facility from the Government of Nunavut Community Government Services (GN-CGS) dated May 7, 2012, as a requirement of Part F, Item 1 of water licence 3BM-ARC0810 (Licence). The submission includes the following documents:

- Cover letter dated April 27, 2012;
- Government of Nunavut; Operations & Maintenance Manual; Volume I; Arctic Bay Waste Water Facility; Project Number OTCD00019054A; Prepared by: exp Services Inc., 04/10/11;
- Government of Nunavut; Operations & Maintenance Manual; Volume II; Arctic Bay Waste Water Facility; Project Number OTCD00019054A; Prepared by: exp, Services Inc. 04/10/11;
- Record Drawings; Government of Nunavut, Arctic Bay Wastewater Lagoon, Prepared by Trow Associates Inc.; Project Number OTCD19054A including;
  - o Overall Site Plan OSP-1
  - o Existing Site ES-1
  - o Proposed Lagoon L-1
  - o Location Plan for Truck Discharge and Decanting TD-1
  - o Details DE-1
  - o Details DE-2
  - o Signage Location Plan SLP-1
  - o Cross Sections CS-1
- Record Drawings; Government of Nunavut, Arctic Bay Wastewater Lagoon Road, Prepared by Trow Associates Inc.; Project Number OTCD19054A including;
  - o Road Detail DE-1
  - o Site Plan SP-1
  - o Access Road Plan and Profile 0+000 to 0+300 PP-1
  - o Access Road Plan and Profile 0+300 to 0+600 PP-2



- o Access Road Plan and Profile 0+600 to 0+900 PP-3
- o Access Road Plan and Profile 0+900 to 1+200 PP-4
- o Access Road Plan and Profile 1+140 to 1+245 PP-5
- Access Road Second Berm Plan and Profile PP6
- Access Road Second Berm Plan and Profile PP7

In its preliminary review of GN-CGS's submission, the Board notes that the O&M Manual only partially addresses the requirements of Part F, Item 1of the Licence:

Part F Item 1 The Licensee shall submit to the Board for approval in writing, within sixty (60) days of issuance of this Licence Amendment, an Operations and Maintenance Manual prepared where appropriate, in accordance with the Guidelines for the Preparation of an Operation and Maintenance Manual for Sewage and Solid Waste Disposal Facilities in the Northwest Territories; 1996. This Manual shall take into considerations comments received during the application review process as well as any Inspector reports, and shall contain the following plans:

- a) Water Supply Facilities Operation and Maintenance Plan;
- b) Solid Waste Operation and Maintenance Plan;
- c) Sewage Operation and Maintenance Plan for the existing Sewage Disposal Facility and the new Wastewater Treatment Facility;
- d) Sewage Sludge Management Plan;
- e) Hazardous Waste Management Plan;
- f) Spill Contingency Plan including a Spill Response Plan for Aggregate deposits;
- g) Monitoring Program Quality Assurance/Quality Control Plan including a diagram that references Monitoring Program Station Numbers; and
- h) Instrumentation Monitoring and Surveillance Plan (This Plan is due within 30 days of issuance of this Licence Amendment. See Part H Item 16)

The O&M Manual does not address the Hamlet of Arctic Bay's Water Supply Facility as required by Part F Item 1(a); the Hamlet's Solid Waste Disposal Facility as required by Part F Item 1(b); nor a Hazardous Waste Management Plan as required by Part F Item 1(e). In addition, the Spill Contingency Plan included in Appendix B of the submission and required by Part F Item 2(f) must also address the Hamlet's Solid Waste Disposal Facility and Aggregate Deposits; the Quality Assurance/ Quality Control Plan included in Section 4 of the submitted O&M Manual must include a covering letter from the accredited laboratory and Analyst, confirming acceptance of the Plan for analyses to be performed; and finally, more details are required regarding geothermal and settlement instrumentation monitoring and surveillance to address Part F Item 1(h) and Part H Item 16 of the Licence.

The Board notes that the submission is labeled as "Draft" and as such will not be accepted as part of Licence No. 3BM-ARC0810 files and will not be subject to a distribution to interested parties for further review. Therefore, the Board is not in a position to approve of the O&M Manual until:

- 1. All components of condition Part F, Items 1 have been satisfied;
- 2. The document is finalized, with all references to "Draft" removed; and
- 3. The document is signed.

GN-CGS is reminded that as stated in its correspondence dated May 6, 2011 (see attachment), processing of the water licence renewal application for 3BM-ARC0810 received March 22, 2010 remains on hold pending submission of a Final Abandonment and Restoration Plan for the existing Sewage Disposal Facility in accordance with Part G Item 2 of the Licence.

In acknowledgement of the statement in this submission's covering letter, that the design report for the



abandonment and restoration of the old wastewater facility has been submitted to the NWB, the Board refers GN-CGS to email correspondence dated April 22, 2012 (see attachment) sent to GN-CGS from the NWB following receipt of the report entitled "<u>Arctic Bay Sewage Lagoon Decommissioning</u>" dated April 2008. The NWB received a copy of this same plan as part of the 2008 water licence amendment application, and as such, it does not satisfy the Board's requirements for proceeding with the 2010 renewal application.

GN-CGS is also reminded that the Hamlet of Arctic Bay's water licence expired on March 31, 2010; however, expiry of the Licence does not relieve the holder from any obligations imposed by the Licence.

Should you have any questions please do not hesitate to contact the NWB office.

Sincerely,

Original signed by:

Phyllis Beaulieu Manager of Licensing

PB/kt

Attachments

Email from K. Tunaley, Tunaley, Lines & Associates, on behalf of the NWB (<a href="https://ktunaley@tlaconsultants.ca">ktunaley@tlaconsultants.ca</a>) to B. Westwll, GN-CGS (<a href="https://ktunaley@tlaconsultants.ca">bwestwell@gov.nu.ca</a>); Subject: <a href="https://ktunaley@tlaconsultants.ca">Hamlet of Arctic Bay Water Licence 3BM-ARC</a>, dated April 22, 2012.

Letter from D.Hohnstein, NWB, to B. Roy, GN-CGS, and J. Qamanirq, Hamlet of Arctic Bay, Re: *Water Licence 3BM-ARC0810 – Part B Item 10: Plan for Compliance*, dated May 6, 2011.

