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| **Subject:** | Hamlet of Arctic Bay Water Licence 3BM-ARC |
| **Date:** | Sunday, April 22, 2012 12:43:31 PM |

Hello Mr. Westwell

Phyllis forwarded me the GN-CGS's submission of the A&R Plan for the Hamlet of Arctic Bay. The NWB received a copy of this same plan as part of the 2008 amendment application. As such it does not satisfy the Board's requirements for proceeding with the 2010 renewal application. The Board requires a plan that satisfies the requirement of Part G Item 2 of the 2008 amendment licence which states:

> The Licensee shall submit to the Board for approval in writing, within ninety (90) days of Licence issuance, a detailed Final Abandonment and Restoration Plan for the existing Sewage Disposal Facility. The Plan shall incorporate, where applicable, the appropriate sections as described in Part G Item 1 and address intervener comments raised during the review process, including specifications and purpose of cover materials over sludge remaining following decommissioning of the Sewage Disposal Facility.

For more background regarding this licence requirement please review page 13 of the licence decision which states:

> In its submission dated September 5, 2008, BGC noted that the Arctic Bay Sewage Lagoon Decommissioning report involves adding a cover of fill material over the sludge to encapsulate the sludge in permafrost. However, it was not clear whether maintaining the sludge in a permafrost condition was a design requirement. BGC recommended that if it is a requirement, that geothermal analyses be carried out to confirm that the proposed cover thickness of 1.5 metres is sufficient to encapsulate the sludge in permafrost and if so, for how long a design period considering the effects of climate change. BGC noted again in its December 10th comments, that this issue had not been addressed in the Applicant's November submission of additional information.
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> Therefore, the Board is requiring as a condition in Part G Item 2 of the Licence Amendment, that the Licensee submit to the Board for approval within ninety (90) days of Licence issuance a detailed Final Abandonment and Restoration Plan for the existing Sewage Disposal Facility. This Plan should incorporate, where applicable, the appropriate sections described in Part G Item 1 and address the concerns raised by BGC.

I hope this helps to clarify the Board's requirements for proceeding with the 2010 renewal application.

Kind regards,
Karlette