



NWB Tools

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## Renewal Water Licence of the Hamlet of Cape Dorset -additional documents.

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

Mon, Jul 16, 2018 at 9:19 AM

To: Assol Kubeisinova &lt;assol.kubeisinova@nwb-oen.ca&gt;, "licensing@nwb-oen.ca" &lt;licensing@nwb-oen.ca&gt;

Cc: "Lusty, Megan" &lt;MLusty@gov.nu.ca&gt;, "Brown, Tim" &lt;Tim.Brown@gov.nu.ca&gt;, "Roy, Bhabesh" &lt;BRoy@gov.nu.ca&gt;

Hi Assol

Please see my responses below in green.

I am sorry for the late reply. Actually I was waiting to complete WL inspection with INAC team. This was done recently.

Please contact me if you have any issue or concern.

Thanks.

Bhabesh

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E-mail: [broy@gov.nu.ca](mailto:broy@gov.nu.ca)**From:** Assol Kubeisinova [<mailto:assol.kubeisinova@nwb-oen.ca>]**Sent:** June 29, 2018 5:13 PM**To:** Roy, Bhabesh**Cc:** Licensing Department**Subject:** Fwd: Renewal Water Licence of the Hamlet of Cape Dorset -additional documents.

Good afternoon Bhabesh,

Thanks for providing the compliance plan. NWB conducted a preliminary review of the application package. Please see the summary below. We are inquiring on these points, as the Interveners may request a response to most of them, if not all.

The original licence names the Tee Lake as the water source. The 2017 Inspector's report names Marcil Lake as the source with water also withdrawn from Ice Lake. Could you please clarify what the sources of water are for the Hamlet?

Ans. Tee Lake is the Main Water Source.

The Hamlet is planning to construct and put in use a mechanical wastewater treatment plan in 2022. Could you please clarify what licence term the Hamlet is requesting in this application?

Ans.: This is a future tense. We need to abandon the existing license first. The new WWTP is not the only facility of the future licence. During that period, the new solid waste facility will be in the advance stage . However, we are anticipating that licence period should be for 15 yrs. Term.

In the 2016 Inspection Report, it is indicated that the P Lake lagoon is leaking. Could you please confirm if the lagoon has ever been in use? If it has, was any remediation work completed?

Ans. This P Lake new lagoon was never used. And no remediation work was planned and carried out.

Below please find some points in regards to the submitted plans and procedures. Would the Hamlet be able to update them before NWB distributes the application package for review by the Interveners? If the Hamlet does not have the resources to update the plans before distribution, then the updates would be part of the licence requirements.

Ans.: It is preferable for a conditional amendment of the exiting licence, excluding the P lake sewage lagoon and its associated structures totally and providing a suitable time period to update any document required to be submitted as the requirements of the Licence.

If it is not possible to obtain the updated plans before distribution, could the Hamlet please provide a response to these points?

1. Operation and Maintenance Procedure for the Existing Sewage Lagoons dated May 2016

a. The Procedure recommends the removal of the acute lethality testing from the requirements of the water licence. Could you please clarify what the rationale behind the recommendation is?

Ans. Our Accredited lab in Ottawa named Caduceon Lab. They or their neighbourhood labs do not test this parameter. It is troublesome to ship out this sample to the lab outside of Nunavut . Again previous INAC inspector Andrew Keim was not in favour much for this type of testing.

b. The Procedure mentions the plan to commission the P Lake lagoon "soon" – according to the application, the P Lake lagoon is not planned to be put in use, so the Procedure calls for an update.

Ans. P lake Lagoon is considered abandoned. No remedial work was planned for this facility.

c. The spill reporting form requires completion.

Ans. This is a template. This form will be filled once any spill occurs at any location.

2. Sewage Lagoon Quality Assurance/Quality Control Plan dated May 2016

a. p. 17 - a monitoring station named "YRB-3" is mentioned, which does not exist in the licence. Maybe a transfer from a different file?

Ans. This is CAP-3 monitoring station located at the discharge point of the first cell of the existing 3 cells lagoon.

b. The list for testing parameters on p. 17 is incomplete. Could you please update?

Ans.: The list of parameters are identified at pages 14 and 15, item 2 of Part H of the expired WL # 3BM-CAP 0810. The QA/QC will be updated accordingly.

c. A letter from a certified QA/QC lab is provided but for the Hamlet of Resolute Bay. Maybe a transfer from a different file?

Ans.: We are using the services from Caduceon Lab for all the Baffin Communities except Iqaluit and Sanikiluaq. A standalone letter will be added once the QA/QC plan will be finally updated accommodating the comments are received from all the interveners.

3. Solid Waste Operation and Maintenance Plan

a. Comparing INAC Inspectors' reports and the submitted O&M Plan, it appears that the Plan does not reflect the present state of the facility, as there have been improvements that were noted by the

Inspectors in their reports. Could the Hamlet please update the Plan?

Ans.: The improvement is in progress rapidly using a metal crusher. We will update the manual once all the comments are received from all the various interveners.

b. Could the Hamlet please update the list of parameters for CAP-2 to reflect licence requirements?

Ans.: CAP- 2 monitoring station shows Leachate parameters at page 14 under item 4 of Part H of the expired licence # 3BM-CAP 0810.

c. Could the Spill Contingency Plan be separated into a standalone document?

Ans. Yes, A standalone spill contingency Plan was submitted to NWB at the same time with QA/QC Plan in 2013/14. However, this O&M should have a chapter inside.

d. Could the Hamlet update the list of groundwater monitoring wells to include a well to be located downstream of the metals dump as per the licence requirements?

Ans. Yes, CAP-20 is the Monitoring well located at the downstream of the Metals Dump.

e. The spill reporting form requires completion.

Ans. This is a template. This will be filled following a spill at certain location.

f. The Plan indicates a location of a "future waste site", but we could not locate it in the application.

Ans. We are still in the planning process. Once a consultant is hired, a future waste site will be identified. We are working forward. The waste management falls under Bundle #3 of CGS Capital planning process. This Project is expected to start in 2018, initially waste Audit, then feasibility study to proceed for final design.

#### 4. Hazardous Waste Segregation, Storage and Transportation Procedure, undated

a. The document suggests placing a liner metal and hazardous waste storage area. Was the recommendation followed? If not, this point could also be included in the Hamlet's Compliance Plan.

Ans.: Currently some of the hazardous wastes are kept in the Sea can. Batteries are all packed and placed on wooden pallets and these are ready for shipment outside. Waste oil dumps are on wooden pallets and hamlet wants to crush them slowly.

Hamlet is crushing metals fast and planning to segregate the hazardous wastes at the same time to stock pile at the designated area on the liner.

#### 5. Groundwater Monitoring Operations and Maintenance Manual dated July 2011

a. As in the Sewage Lagoon O&M plan, the document is missing a groundwater well downstream of the metals dump.

Ans. There is a standalone O&M manual for all the ground water Monitoring wells submitted to NWB few years ago.

#### 6. Feasibility Study on Metal Waste Site dated 2009

Since the document was issued nine years ago, could you please confirm whether the points below raised in the Study were followed up? The Study:

a. Recommends the hazardous wastes to be removed annually.

Ans.: Hamlet is now working forward step by step.

b. Expresses the community's concerns over the distance to the tidal land bridge.

Ans. Following the discussion with the INAC inspector Andrew Kim, a berm was constructed at the lower end of the Metal dump in order to protect entering any saline water to come inside the metal Dump site during high tide.

c. Expresses a concern over the inadequate capacity of the landfill.

Ans. Yes. We are working forward for a new facility and at the same time maintaining the existing facility.

d. Provides a list of recommendations on waste management procedures (page 27, s. 7).

Ans. : We are expecting a consultant for the Solid waste management. The waste audit and feasibility study are expected to start at any time in this fiscal year 2018-19. Process and Procedure will be established following these studies.

These points, if not already followed up on, could be included in the Hamlet's Compliance Plan.

Ans.: Please use these answers as the part of the submission and distribute the application for public review. It might be wise to collect comments from all the parties (interveners) and correct/update the Compliance plan one time for the final submission to the Board.

In addition, our records indicate a 2016 correspondence from GN-Department of Health and INAC regarding the sewage lagoon effluent exceedance of the Canadian Shellfish Sanitation criteria and its effect on traditional harvesting of clams. Could the Hamlet please clarify what measures were taken to follow up? Please note that NWB will include the GN Department of Health in the list of agencies requested to review the application.

Ans. The structural stability of the existing lagoons is the priority. We have installed two overflow pipes at the lower berm so that over flow could easily take place maintaining 1 m free board. We are also decanting emergency Lagoon on weekly basis during winter time. The situation has been compromised using Tim Brown's letter to INAC. We are pushing forward the new WWTP and new Solid waste Management projects as earliest as possible.

At the same time, Hamlet is trying to maintain all the water Licensed facilities to their best.

[Quoted text hidden]

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## 2 attachments



**3BM-CAP0810 Compliance Cape Dorset May 24,2018..xlsx**  
19K



**Cape Dorset Wastewater Schedule - INAC - November 17, 2016.pdf**  
624K