



Phyllis Beaulieu <phyllis.beaulieu@nwb-oen.ca>

[Licensing] 3BM-CAP0810 Cape Dorset Compliance Review

1 message

Justin Hack <Justin.Hack@aandc-aadnc.gc.ca> Wed, Apr 2, 2014 at 12:44 PM
To: Ralph Ruediger <RRuediger@gov.nu.ca>
Cc: Erik Allain <Erik.Allain@aandc-aadnc.gc.ca>, Bharesh Roy <broy@gov.nu.ca>, Bill Westwell <Bwestwell@gov.nu.ca>, Damien Côté <damien.cote@nwb-oen.ca>, Phyllis Beaulieu <licensing@nwb-oen.ca>

Hi Ralph,

Sorry for the mix up with the previous email (RE: Review of the Taloyoak state of Compliance). Below is my review of your progress with the **Cape Dorset Water License 3BM-CAP0810** and compliance with the Compliance Plan.

Again, for Cape Dorset, many of these conditions were assumed fulfilled after the GN's last submission of documents on March 14, 2014; however, many of the documents were not up to the standard required by the Inspector in order to fulfill the outstanding conditions of the licence. And in many instances, **no work** has been completed to even address the issue, even after the Original due date and the due date as per the Compliance Plan. Furthermore, many of the issues of non-compliance can be solved through simple administrative work and there is no excuse for delay.

Ralph, I am requesting you address each and every issue of non-compliance in this email, and explain exactly where you are in the process. Have your comments to me by **April 14, 2014**.

Regards,

Justin

License Condition	Deliverables	Original due date	Due Date, as per Compliance Plan	Status of Compliance	Documented on CIDMS (#)	On NWB ftp server (Y/N)	General Comments
B2	A monitoring program, which will include all sampling	March 7, 2008	March 31, 2013	Outstanding		N	Sampling has been included in the 2013 Annual Report. However, the sampling included is unacceptable because the sampling results do not correspond to any approved monitoring stations. This will have to be clarified for the 2013 sampling program and moving forward. All samples need to be clearly labeled . Also, given the number of samples provided, it does not appear that a full monitoring program was implemented. Provide appropriate clarification by April 14, 2014.
GN Comments:							
B5	Posted Signs	November 16, 2008	August 31, 2013	Outstanding		N	Signs CAP-1, 2, 3, 4, 5 have been installed. Signs CAP-6 to 18 need to be installed when 2007 Sewage Facility is commissioned. Signs CAP-18 to CAP-24 are outstanding.
GN Comments:							
D8	Conduct Acute Lethality Tests	March 31, 2009	August 31, 2013	Outstanding		N	The GN has not completed Acute Lethality tests to date. The GN claims that logistics are preventing them from achieving this. On February 10, 2014 a letter was submitted to the NWB explaining the issue. If the GN would like this condition removed, a formal amendment application will have to be filed. This item is still outstanding. Have this completed by April 10, 2014.
GN Comments:							
D8	Plan of Action	NA	July 1, 2013	Outstanding		N	A plan of Action on how to commission the 2007 Sewage Lagoon has not been provided. In order to fulfill this criteria, it would require outlining specific timelines of the necessary steps required to commission the 2007 Sewage Facility. This will remain outstanding until a Formal Plan is submitted.
GN Comments:							

F1	O&M Manual for 2001 Sewage Treatment System	June 7, 2008	July 1, 2014	Outstanding	N	The exp report has stated that an O&M Manual for the 2001 Sewage Disposal Facility has been prepared but it does not meet the requirements of the water licence. This is to be completed by July 1, 2014.
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GN Comments:

F2	O&M Manual for Solid Waste Disposal Facilities	June 7, 2008	July 1, 2014	Awaiting Submission	N	GNs states that this O&M is not prepared and they are waiting for a new project. It is not clear what this new project is and regardless, this is an unacceptable reason for delay. This report was supposed to be submitted on June 7, 2008. The Solid Waste Disposal Facility needs an O&M Manual. This is to be completed by July 1, 2014.
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GN Comments:

F5	Development of a Plan recommending Capital Improvements	NA	March 31, 2014	Outstanding	N	The GN states that, "A Study will be completed in the summer of 2014 to identify the root cause of the failure of the Cape Dorset sewage lagoon. Once the root cause has been identified, the solution will be placed on to the Capital Plan for GN funding." What is the progress of this study? Has a consultant been hired?
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GN Comments:

G1	Detailed A&R for 2001 Sewage Lagoon	June 7, 2008	February 28, 2014	Outstanding	N	GN states, "A&R plan will be ready once 2007 built lagoon is commissioned." This is unacceptable. The A&R Plan was supposed to be submitted June 7, 2008. This plan is 6 years overdue and is a requirement of the licence. This item will remain outstanding until submitted, further enforcement action may result if further delays.
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GN Comments:

G1	Detailed Emergency Sewage Disposal facility	June 7, 2008	February 28, 2014	Outstanding	N	GN states, "A&R plan will be ready once 2007 built lagoon is commissioned." This is unacceptable. The A&R Plan was supposed to be submitted June 7, 2008. This plan is 6 years overdue and is a requirement of the licence. This item will remain outstanding until submitted.
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GN Comments:

G2	Conceptual A&R for all facilities not covered under G1	September 8, 2008	February 28, 2014	Outstanding	N	This is still outstanding and was due 6 months after the issuing of the license. What is the status of these Conceptual A&R Plans.
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GN Comments:

H1	Posted Signs	November 16, 2008	August 31, 2013	Outstanding	N	See B2.
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GN Comments:

H6	Have appropriate thermistors	Friday, March 07, 2008	September 15, 2014	Awaiting Submission	N	A letter was sent to NWB by GN informing them that they would like to amend this section of the licence. This is not an amendment application. Until this is completed or appropriate thermistors are installed, this remain outstanding.
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GN Comments:

Justin Hack
Water Resource Officer
Aboriginal Affairs and Northern Development
Iqaluit, NU X0A 0H0
Nunavut Regional Office
Tel: 867-975-4289
Justin.Hack@aandc.gc.ca