



P.O. Box 119  
Gjoa Haven, NU X0B 1J0  
Tel: (867) 360-6338  
Fax: (867) 360-6369

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NUNAVUT WATER BOARD  
NUNAVUT IMALIRIYIN KATIMAYINGI  
OFFICE DES EAUX DU NUNAVUT

File: 3BM-CAP0810/F1

June 26, 2009

Mr. Bhabesh Roy, M.A.Sc., P. Eng.  
Municipal Planning Engineer  
Government of Nunavut  
Department - Community and Government Services  
Baffin Region  
P.O. Box 379, Pond Inlet X0A 0S0  
By Email: [broy@gov.nu.ca](mailto:broy@gov.nu.ca),

**Subject: Operation and Maintenance Manual, 2007 Sewage Disposal Facilities, Hamlet of Cape Dorset, Part F, Item 1 and Administrative Review of Licence 3BM-CAP0810**

Dear Mr. Roy,

The Nunavut Water Board (NWB) acknowledges receipt of an Operation and Maintenance (O&M) Manual<sup>1</sup> submitted with your cover letter on June 17, 2009. A revised O&M Manual was a requirement of Part F, Item 1 (F1) of Licence 3BM-CAP0810 issued to the Hamlet of Cape Dorset on March 7, 2008 following the NWB's public hearing process.

Part F, Item 1 of the Licence states the following:

The Licensee shall submit to the Board, for approval in writing, within ninety (90) days of issuance of the Licence and prior to commissioning of the 2007 Sewage Disposal Facilities, a revised *Operation and Maintenance Manual, Sewage Treatment System, Hamlet of Cape Dorset, November 7, 2007*. The revision shall include the requirements of Schedule 2.

Schedule 2 details twenty six (26) required O&M Manual revisions that were to be submitted for review and approval of the Board in writing, within ninety (90) days of issuance of the Licence, which corresponds to June 7, 2008.

The NWB has undertaken an initial conformity assessment of the O&M Manual, which is attached for your attention. The assessment has determined that only one of the 26 required items for revision has been satisfied. Of particular concern is that the O&M Manual submitted with your letter on June 17, 2009, is dated October 24, 2007. This appears to be an earlier version of the O&M Manual on file, dated November 7, 2007 that was subject to the revisions.

Under these circumstances, the NWB is rejecting the submission and **requires that the O&M Manual be revised to take into account the requirements of Schedule 2 and be resubmitted.** The NWB is

<sup>1</sup>Operation and Maintenance Manual, Sewage Treatment System Hamlet of Cape Dorset, October 24, 2007. 05-4319-5000, Dillon Consulting Limited.

also requesting that the revisions be identified using a similar conformity table identifying the change and location within the Plan, and submitted as part of the Plan in order to make review of the Plan efficient. Please note that Part F1 requires that the O&M Manual be approved by the Board in writing and will be subject to distribution to interested persons for a thirty (30) day review period, requesting expert advice and comments on the submission, prior to a decision being made by the Board.

The NWB further notes that your letter, received June 17, 2009, may suggest that through the submission of the O&M Manual, the 2007 Sewage Facility is now qualified for commissioning. Given that the current O&M Manual does not satisfy Licence condition Part F1, the facility's commissioning cannot be authorized at this time.

In addition to condition F1, the NWB would also like to bring to your attention, conditions E5, H7, H8 and H25, which are also requirements of the Licence, prior to the 2007 Sewage Disposal Facilities being commissioned.

Finally, the NWB has taken the opportunity to review the file overall and notes that, in addition to the above, a number of other conditions have not been met. Those requirements are also detailed in the attached table which contains three worksheets for your attention. The first worksheet deals the O&M Manual and its conformity to the Schedule 2 revision requirements, the second deals with the conditions related to the commissioning of the 2007 Sewage Disposal Facility, and the third deals with general submission requirements of the Licence. The NWB requests that each of the outstanding items in the table be addressed in your response. Your response should provide an update on the status of each condition and a timeframe for compliance with each outstanding condition.

You will recall that the decision to issue Licence 3BM-CAP0810 was a particularly difficult one<sup>2</sup> for the Board and it is the Board's intention to carefully monitor the Licensee's efforts to come into compliance with the Licence<sup>3</sup>.

If you require clarification or wish to further discuss the above and any other issues, please do not hesitate to contact me.

Yours truly,

*Original signed by:*

David Hohnstein, C.E.T.  
A/Director Technical Services

Cc: Distribution list  
S. Lines, TLA

Encl. NWB O&M Manual conformity assessment and Licence file assessment (excel file).

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<sup>2</sup> Record of Proceeding/Reasons for Decision for 3BM-CAP0810. Pg. 13.

<sup>3</sup> Record of Proceeding/Reasons for Decision for 3BM-CAP0810. Pg. 19.