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Department of Environment

Ministère de l'Environnement

November 6, 2009

Richard Dwyer
Licensing Administrator
Nunavut Water Board

via Email to: licensingadmin@nunavutwaterboard.org

RE: NWB FILE # 3BM-CAP0810 – Hamlet of Cape Dorset O&M Plan

Dear Mr. Dwyer:

The Government of Nunavut, Department of Environment (DOE) has reviewed the Operations and Maintenance Manual from the Hamlet of Cape Dorset. The DOE has the following comments and recommendations to make based on the *Environmental Protection Act*.

SLUDGE MANAGEMENT

The proponent has stated on page 15 that “Approximately 15 years after commissioning, a study will be undertaken to determine the need and frequency for sludge removal and disposal over the lifetime of the lagoon.” DOE recommends that this study be carried out earlier than 15 years, and that a formal sludge management plan be developed. This plan should outline the chemical composition of the sludge as well as when, where, and how the sludge will be stored, treated, and eventually disposed of.

MONITORING

The proponent has stated that “It is recommended that following the first year of operation the amount of sampling for the monitoring program be adjusted by eliminating those locations that are not considered essential to monitoring the treatment system.” It is the GN-DOE’s opinion that 1 year of data is not sufficient to perform a trend analysis to determine essential monitoring points. DOE recommends that the Board suggest a longer time period in order for the proponent to obtain a sufficient amount of data.

Page 8 of the manual states “The effluent discharged from either the 2001 Sewage Disposal Facility at sampling station CAP-3 and/or the Emergency Sewage Disposal Facility at sampling location CAP-4...”; however, page 11 lists CAP-4 and not CAP-3 as the 2001 Sewage Disposal Facility, and CAP-5 and not

CAP-4 as the Emergency Sewage Disposal Facility. DOE recommends that this inconsistency be reviewed and corrections made accordingly.

Page 12 states that “wastewater samples will be taken from locations CAP-3 to CAP-15 one (1) week prior to the proposed decant date and weekly during the course of the lagoon decant.” However, page 19 states that the sampling for that timeframe is to be performed at CAP-6 to CAP-14. DOE recommends that this inconsistency be reviewed and corrections made accordingly.

EFFLUENT QUALITY

Page 10 states that a fecal coliform discharge of 1.5×10^4 CFU/100 mL is expected after the treatment stage; however, the current water license states that the fecal coliform concentration must be less than 1.0×10^4 CFU/100 mL. DOE requests that the proponent review this discrepancy.

SPILL CONTINGENCY PLANNING

As per prior submissions:

- DOE requests that the proponent provide in the manual a thorough description of training that workers will receive.
- DOE monitors the movement of hazardous wastes, from generators, carriers to receivers of the wastes, through the use of a tracking document known as a Waste Manifest. A Waste Manifest must accompany all movements, and all parties must register with DOE by contacting Robert Eno at (867)975-7729 or reno@gov.nu.ca. This procedure should be stated in the spill plan.

The DOE thanks the NWB for giving us the opportunity to review and provide comments on the Hamlet of Cape Dorset's Operations & Maintenance Manual. Please contact us if you have any questions or comments.

Yours sincerely,

Original signed by

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