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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYIT
OFFICE DES EAUX DU NUNAVUT

File: 3BM-CLY0909/F1, F2

October 21, 2011

Mr. Grant Scott
Acting Assistant Regional Director
Community Government Services
Government of Nunavut
Pond Inlet, Nunavut
X0A 0S0
Email: gscott1@gov.nu.ca; cao@clyderiver.ca

and,

Troy Jenkins
Senior Administrative Officer
Hamlet of Clyde River
Clyde River, Nunavut
X0A 0E0

Subject: Water Licence 3BM-CLY0909 – Operations and Maintenance Manual for Wastewater Treatment Facility, Hamlet of Clyde River

Dear Mr. Scott and Mr. Jenkins

Water Licence 3BM-CLY0909 (Licence) required the Hamlet of Clyde River (Licensee) to submit to the Nunavut Water Board (NWB or Board) for approval in writing within sixty (60) days of issuance of the Licence an Operations and Maintenance (O&M) Manual in accordance with Part F, Item 1. This O&M Manual was to include the following plans:

- a) Water Supply Facility Operation and Maintenance Plan;
- b) Sewage and Solid Waste Operation and Maintenance Plan;
- c) Hazardous Waste Management Plan;
- d) Sludge Management Procedures;
- e) Spill Contingency Plan, including updated Spill Response Plan for Aggregate Deposits; and
- f) Monitoring Program Quality Assurance/ Quality Control (QA/QC) Plan.

In addition, Part F, Item 2 of the Licence requires the Licensee to submit to the Board for approval a minimum of ninety (90) days prior to commissioning of the Enhanced Sewage Disposal Facility, a revision to the O&M Manual referred to in Part F, Item 1 to take into consideration the new facility.

Achieving compliance with these conditions has been an ongoing process which is outlined as follows. As part of the Government of Nunavut Community Government Services (GN-CGS) Licence renewal application dated October 27, 2009, the NWB received a draft document entitled “*Operations and Maintenance Manual for the Wastewater Treatment Facility Hamlet of Clyde River*”, prepared for GN-CGS by Trow Associates Inc. (Trow), dated September 2009. On November 27, 2009 the NWB noted in it’s acknowledge of receipt of the renewal application that the document did not address the Solid Waste Facility; Hazardous Waste Management; or the Water Supply Facility as required by Part F, Item 1 of the Licence, and that the draft document required finalization as well as Board approval. In response, on December 9, 2009, GN-CGS re-submitted the document entitled “*Clyde River Truckfill, Clyde River, NT, Operations and Maintenance Manual*” prepared for the Government of Northwest Territories by Dillon Consulting Limited, dated June 22, 1998.



A few months later, on March 30, 2011, the NWB received another draft document from the GN-CGS entitled “*Operations and Maintenance Manual for the Wastewater Treatment Facility Hamlet of Clyde River*” prepared for the GN-CGS, by Trow, dated January 2011 (Manual). On April 26, 2011, the NWB acknowledged receipt of the document noting that it was labeled “Draft” and requesting either: (1) written clarification that it was intended for implementation; or (2) submission of a finalized version of the document that is intended for implementation, issued without the “Draft” label to avoid confusion. In response, on May 5, 2011, the GN-CGS submitted the finalized Manual, dated January 2011, which also included sludge management procedures, Spill Contingency Plan and QA/QC Plan for the Wastewater Treatment Facility. On May 19, 2011 the NWB distributed the finalized Manual to interested parties for review and comment. By July 11, 2011 written representations were received from Environment Canada (EC) and Indian and Northern Affairs Canada (INAC).

While the Board acknowledges the aforementioned efforts of the Hamlet of Clyde River and GN-CGS to satisfy the subject conditions, it cannot overlook the fact that sub-items (b), (c), (e), and (f) of Part F, Item 1 of the Licence, have not been completed with respect to solid waste and hazardous waste management. As such, the Board is not in a position to approve of the O&M Manual until all components of the condition have been satisfied.

At this time, the Licensee is advised to revise the current O&M Manual for the Wastewater Treatment Facility to address the comments received during the review process and to resubmit a complete O&M Manual that addresses all the components required by Part F, Item 1 of the Licence including solid waste and hazardous waste management. The comments on the O&M Manual are available at the NWB’s ftp site at the following address:

[ftp://nunavutwaterboard.org/1%20PRUC/3%20MUNICIPAL/3B/3BM%20-%20Municipality/3BM-CLY0909/3%20TECH/7%20OM%20PLAN%20\(F\)/](ftp://nunavutwaterboard.org/1%20PRUC/3%20MUNICIPAL/3B/3BM%20-%20Municipality/3BM-CLY0909/3%20TECH/7%20OM%20PLAN%20(F)/)

Furthermore, as stated in its correspondence dated February 25, 2011 (attached for your reference), the NWB’s processing of the water licence renewal application for 3BM-CLY0909 received November 27, 2009 remains on hold pending submission and Board approval of a revised Plan for Compliance.

Should you have any questions please do not hesitate to contact the NWB office.

Sincerely,

Original signed by:

David Hohnstein, C.E.T.
Director of Technical Services

DH/kt/

Attach: Letter, NWB to Mr. Bhabesh Roy, GN-CGS and Mr. Troy Jenkins, Hamlet of Clyde River SAO,
re: Water Licence 3BM-CLY0909 - Plan for Compliance, dated February 25, 2011.

cc. Bill Westwell
Roy Green

