From: <u>David Hohnstein</u>

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Cc: <u>Phyllis Beaulieu</u>; <u>Dionne</u>; <u>Richard Dwyer</u>

Subject: Municipal Licensing Meeting - Baffin Region 13Feb09 Summary Minutes

Date: Tuesday, March 03, 2009 7:07:46 AM

Attachments: 090227 3BM-CLY and KIM 09Feb13 Teleconference Meeting Minutes-OTDE.pdf

Good day everyone,

Please find attached, a summary of the meeting held on February 13, 2009 with respect to the Municipal Licences for Clyde River 3BM-CLY0308 (renewal pending) and Kimmirut 3BM-0911 (renewal/amendment recently issued).

With respect to the action items listed at the end of the summary:

Item 1; the NWB forwarded reference files to the GN (Bhabesh/Patricio) on February 14, 2009 along with a link to a QAQC Plan submitted for another municipality that is a good reference for what is required within the QAQC Plan;

Item 2; On February 17, 2009, the GN provided the NWB with a number of emails (and attachments) intended to provide the requirements of the Plan for Compliance under Part B, Item 10 of the amendment issued September 15, 2008 as well as the O&M Manual.

These included:

- 1) Cover letter;
- 2) Copy of email "D. Hohnstein to Bhabesh Roy, re: Clyde River Water Licence and the outstanding Plans;
- 3) Copy of meeting agenda for February 13, 2009;
- 4) Document entitled "Plan of Compliances Hamlet of Clyde River Water Licensed Facilities", prepared by Bhabesh Roy;
- 5) The above document included a QC Plan outline, QA Plan outline, Spill Contingency Plan (reporting info), a section on Preservation and Shipping of Bottles, a section on A) Water Supply Management, B) Wastewater Management (details of QAQC and Spill Contingency Plan were not provided and indicated to be included in the final O&M Manual for the new facility), D) solid waste management
- 6) A letter from INAC enforcement with procedure instructions during (emergency) decant:
- 7) Appendix A, Spill Report Form;
- 8) Appendix B, Water Quality Monitoring; included Chlorine testing of drinking water (results sheet), instructions on mixing hypochlorite, GN Dept of Health info sheet on disinfection;
- 9) Appendix C, Procedures and Guidelines of GN DoE on Drinking water quality management; water sampling, cleaning and disinfecting water storage tanks, drinking water disinfection, guidelines for drinking water delivery, superchlorination of water trucks, and taking care of water storage tanks;
- Appendix D, QAQC log sheet of GN DoE on Drinking water quality management, 2008 (results for Feb/April only);
- 11) Appendix E, Construction schedule of Sewage Lagoons (it was noted that the schedule include a "rehabilitation of existing lagoon, but no information on

- sewage disposal during this time prior to commissioning), standard operating procedures from Caduceon Env Labs on sample bottle requirements;
- 12) Appendix F, Wastewater effluent test results 2008 lab reports (samples obtained June 1,3 and 18, 2008), test methods documents for BOD5 and TSS;
- 13) Appendix G, INAC Inspection report, 2008; numerous non-compliance issues were identified in this report which have not been addressed in the submitted information (requested by INAC during the teleconference); these included treatment and flow measurement (Water supply), discharge water quality, Spills, O&M Manual, overflow drain installed at sewage lagoon allowing raw sewage to be discharged directly to the environment (Sewage disposal), spills in Hazwaste area, overturned drums (solid waste disposal);

Item 3; in general, the information provided above does not fully meet the requirements for a QAQC Plan, nor the O&M Manual as required by the licence. The information is scattered throughout the documentation provided, and is not in any logical order to enable a reviewer to adequately assess the quality of information. The information is also not "Site Specific" which leaves to the operators discretion on how to apply the concepts. The submission will require revision with additional information and some organization and direction to indicate to the reader where information is presented. Simple table of contents would help. There is a lot of information that has been attached as provided by other sources and this should be incorporated into either the Plan for Compliance or O&M Manual (respectively) to present the information as it applies to the Hamlet of Clyde River and its Licence.

If extracted from the overall submission, the information required for a "Plan for Compliance" is available, with the exception of providing the details on how the Hamlet intends to address the concerns of the Inspector in the most recent inspection report filed with the NWB (INAC request at during teleconference). In addition, under Appendix F, where wastewater effluent test results were provided, only BOD and TSS results are included, where Part H, Item 2 of the Licence clearly indicates that monitoring be carried out for a number of parameters (results for compliance were not included for fecal coliform, pH or Oil and Grease. No mention of these omissions were included, nor explanation on the efforts to bring the Licensee into compliance on these issues.

Item 4; Staff is currently discussing with Legal counsel on options to proceed;

Item 5; this item will be up to GN and TROW to determine details for submission.

I trust that the information is adequate to summarize the teleconference and what has taken place since. The Clyde River Licence is to expire on the 15th of March and the issue of renewing the licence for a short term, or extending the term to allow for compliance issues to be ironed out, is to be determined shortly. If you have any additional comments for information that may have been omitted or incorrectly addressed, please contact me as soon as possible so that corrections, if any can be incorporated into the meeting notes for everyone.

Regards,

David Hohnstein

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

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