



## 3BM-COR1521 Water Licence Renewal

Tue, Jun 29, 2021 at 9:42 AM

Thanks,

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**From:** Sergey Kuflevskiy <[sergey.kuflevskiy@nwb-oen.ca](mailto:sergey.kuflevskiy@nwb-oen.ca)>

**Date:** Wednesday, May 19, 2021 at 2:37 AM

**To:** "Chalmers, Elan" <[EChalmers@gov.nu.ca](mailto:EChalmers@gov.nu.ca)>

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**Subject:** 3BM-COR1521 Water Licence Renewal

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Hi Elan,

I am the NWB Technical Advisor assigned to the Coral Harbour file. I was just going through the Application you submitted and have encountered a few questions, which I hope you can answer before we send this Application out for a public review.

1. The 2020 Annual Report provides two different water consumption numbers: 35,730m3 at COR-1 and 39,973 m3 in Section (e), which states the following:

*Reservoir refill was completed between August 24th and September 16th. A volume of 39,973 m3 was pumped into the reservoirs during this time.*

Could you please clarify the reason for this discrepancy? Additionally, what is the expected population growth for the next 10 years? Will 45,000m<sup>3</sup> of fresh water be sufficient for annual consumption considering this growth factor?

2. Section 24 of the Application Form states that no construction is planned during the term of the Licence. However, the Executive Summary indicates that *the Municipality is in the process of upgrading the fencing around the Solid Waste Facility*. Additionally, the 2020 Annual Report states the following:

*CGS is seeking funding to develop a business case for upgrades to the current wastewater treatment facility. This business case would evaluate design option to develop an impermeable lagoon to hold 10-12 month of sewage. It would also include a comprehensive study of the wetland treatment area and the receiving environment to recommend effluent treatment parameters that are appropriate for this type of wastewater treatment system.*

If the upgrades to the current Wastewater Treatment Facility are anticipated within the next 5-10 years, and some fencing work will be done around the Solid Waste Facility, it would be beneficial to include these activity within the scope of the Application (you can just confirm this with your response to this email).

3. In the Plan for Compliance provided with the Application, Line B-1-h, as well as Lines F-1, F-3, F-2, F-4, and H-13, state the following:

*CGS will submit updated and revised Water Supply OM plan, Sewage Waste OM plan, Solid Waste OM plan, Spill Contingency plan, and QA/QC Plans to NWB by June 30, 2021.*

Could you please confirm that these Plans will be provided by June 30th? If this is the case, it would probably be more feasible to send the Application for a public review once all updated Plans are submitted.

4. Line D-2 of the Plan for Compliance states that the GN-CGS will preserve the current effluent limits and *will apply for an amendment to the current effluent limits when appropriate*. However, the 2020 Annual Report states the following:

*The Licensee plans to submit an application for an amendment to the current 30/30 mg/L*

*BOD/TSS effluent parameter limits for the COR-5 sampling point. The effluent results do not consistently meet these treatment objectives.*

Please clarify if such amendments are requested under this Application?

5. Line D-5 is marked as "*in compliance*". However, the 2018 and 2019 CIRNA Inspection Reports indicated that there was a seepage occurring through the berm of the Sewage Disposal Facility (SDF) and requested to *improve the berm wall directly adjacent to monitoring station COR-3* to preserve structural integrity of the SDF. Could you please clarify whether this issue has been resolved or provide an explanation with a proposed timeline for the repairs?

6. Line E-4 of the Plan for Compliance states that the GN-CGS *will submit the as-built drawings for the new water treatment facility as part of the renewal application*. The Application package includes the As-Built drawings, dated November 23, 2016 and the Executive Summary states that the Water Treatment Plant was commissioned in 2016. However, the 2018 and 2019 Annual Reports state the following:

*The new Water Treatment Plant was substantially completed December 2016 and warranty work is still being completed (Regional CGS Project Management Office). Repairs to the chlorine system were completed during 2018; more work is to come in this regard in 2019.*

Could you please clarify when this work was actually completed and when the most up-to-date As-Built drawings will be submitted? Additionally, the Board would like to remind the Applicant that the As-Built drawings should be supplemented by the Contraction Summary Report (or Completion Report).

7. Line F-5 is requesting that the Municipal Engineer's recommendations pertaining to all engineered facilities can be summarized in the Annual Reports. The NWB would like to remind the GN-CGS that this provision allowing Municipal Engineers to complete and summarize such annual inspections within the Annual Reports was already included into the Licence at the request of the GN-CGS (Megan Lusty (GN-CGS) to Brady MacCarl (NWB), dated January 16, 2014; and pp. xvi-xvii of the Licence).

8. The Board understands that the 2015 CIRNAC Inspection took place on August 11, 2015, as per the 2015 Annual Report, and that there is still no record of this inspection, according to Line G-3 of the Plan for Compliance. It is also unclear if the inspection of the second Solid Waste Disposal Facility near the Hamlet Airport took place during the 2015 CIRNAC Inspection. However, the Board would like to remind the GN-CGS about their recommendation made during the previous Licence renewal process (Megan Lusty (GN-CGS) to Brady MacCarl (NWB), dated March 2, 2015):

*Because of the uncertainty surrounding the second storage site identified, we are recommending that this area is included in the 2015 AANDC Municipal Inspection and that the Hamlet of Coral Harbour, CGS, AANDC, and the NWB work together to determine the best plan of action regarding the findings of this inspection.*

The Board is of understanding that a representative of the GN-CGS participated in the 2015 CIRNA Inspection and requests the Applicant to provide more clarity with respect to the findings of that Inspection and any future plans for the abandoned facility.

Please let me know if you have any questions.

Kind regards,

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