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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

New File: 3BM-GJO/Application
Old File: NWB3GJO0409

June 24, 2010

Mr. Gary Strong, P.Eng.
Project Manager
Dillon Consulting Limited
303, 4920 – 47th Street
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By Email: gstrong@dillon.ca

Enuk Pauloosie
Senior Administrative Officer
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Subject: NWB3GJO0409 Hamlet of Gjoa Haven, NU; Renewal Application

Dear Mr. Strong,

The Nunavut Water Board (NWB) acknowledges receipt of an application to renew the Type “B” municipal water Licence, No. NWB3GJO0409, issued to the Hamlet of Gjoa Haven. The application was submitted by Dillon Consulting Limited (Dillon), on behalf of the Hamlet, on April 21, 2010.

The renewal application, as submitted, contains the following documentation:

- Letter from the Hamlet authorizing Dillon Consulting to act on behalf of the Hamlet;
- Letter from the Hamlet requesting the renewal;
- Letter from Dillon Consulting Re: Hamlet of Gjoa Haven Water Licence Renewal Application – Licence Number NWB3GJO0409;
- Water Licence Renewal Application;
 - Appendix A – Figures;
 - Appendix B – Effluent Sampling Analysis Results from August 2009; and
 - Appendix C – Gjoa Haven Waste Management Assessment.

The NWB has undertaken a preliminary assessment of the application and has determined that there are a number of items that must be addressed prior to distributing the file for review and comment by interested parties.

Previously, the NWB wrote to Hamlet on May 13, 2009 following receipt of a letter from the Senior Administrative Officer, requesting that the Licence be renewed. In its letter, the NWB provided the Hamlet with an administrative compliance assessment that identified significant

compliance issues with the previous Licence. The issues highlighted at the time included the failure of the sewage lagoon, resulting effluent quality, solid waste management, monitoring, reporting and the submission of plans in accordance with the Licence. To address these issues the NWB had requested that the Licensee submit a **Plan for Compliance**, which demonstrates the ways and means the Licensee will undertake to achieve full compliance with the applicable Licence conditions and any issues raised by the Inspector. **A copy of the Plan for Compliance template is provided.**

The NWB acknowledges that the Gjoa Haven Waste Management Assessment (Appendix C) proposes to address sewage effluent issues by incorporating an un-engineered wetland area. However, the report further states that:

Decisions regarding the use of the wetland for sewage effluent treatment should not be based solely on the above data. This data was collected in August and therefore represents only one condition experienced in the wetland. A wetland monitoring system should be put in place to observe conditions in the wetland during the entire year. This is especially important in the spring as spring runoff will increase the amount of water flowing through the wetland. The monitoring system should be performed on a weekly basis during spring runoff and on a monthly basis for the rest of the summer and fall. No treatment will occur during the winter in the wetland as it is very shallow will completely freeze. (Pg. 6).

And,

Another point of concern is leachate from the nearby landfill draining into the wetland. Further sampling for metals should also be incorporated into the wetland monitoring program to determine the level of impact on the wetland. (Pg. 6).

Section 5 of the report contains additional recommended actions. However, outside of this report, a commitment from the Hamlet to undertake the proposed actions has not been made. Therefore, the NWB asks that the Licensee submit the Plan for Compliance, as previously requested, to address the issues outlined in the administrative compliance assessment and Inspector's reports. The Plan for Compliance should state the actions the Licensee will take to address the issues along with a timeline for implementing each action. A template for the Plan for Compliance has been drafted by the technical department of the NWB and can be provided upon request for use in fulfilling this obligation. The NWB acknowledges and appreciates that a timeline has been provided for the submission of the Plans named in Dillon's application cover letter dated March 19, 2010.

Finally, in order for the application to be complete, an executive summary in English and Inuktitut will be required.

The NWB will proceed with distributing the application for review and comment upon receipt of the Plan for Compliance and executive summaries. Please submit the requested information to the undersigned by **July 16, 2010**. Non-scanned pdf format is preferred for the submission of documents to allow for ease of searching information.

Should you have any questions regarding the above, please do not hesitate to contact the undersigned at (780) 443-4406 or email dts@nunavutwaterboard.org or Mr. Stephen Lines at (403) 697-7897 and slines@tlaconsultants.ca.

Yours truly,

Original Signed By:

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

DH/tla

Cc: Hamlet of Gjoa Haven
R. Green, rgreen@gov.nu.ca
Bill Westwell, BWestwell@GOV.NU.CA
Jennifer Jones, Dillon Consulting Limited