

October 30, 1998

To: Nunavut Water Board
PO Box 119
Gjoa Haven, NT X0E 1J0

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**HAMLET OF GJOA HAVEN - COMMENTS ON WATER LICENCE APPLICATION
NWB-3GJO FOR MUNICIPAL WATER USE AND WASTE DISPOSAL**

On behalf of Water Resources Division (WRD), Regulatory Approvals Section (RAS) I have reviewed the above mentioned Water Licence Application and supporting documentation and have included relevant comments. Please note that as a reviewer, WRD's assessment takes into consideration water quality and quantity considerations and waste disposal methods only.

Reference: NWB Request for Comments - Due November 20, 1998

Based on the information provided in the above mentioned document, I have the following comments:

- Within the water treatment plant the storage and filtration systems are by-passed as a result of the time required for recharge between truck fill ups. What is the quality of the water coming out of the plant? Is it acceptable? Are there any plans to use these systems or upgrade the storage and filtration systems? Filtration can often be an important part of the process and may be required down the road. This should be looked into.
- There are concerns that as a result of a new subdivision adjacent to the Water Supply Lake that there may be wind blown debris problems. Some type of fencing should be erected in order to reduce the effects of wind blown debris to Water Supply Lake.
- According to the inspector, the water reservoir dyke does not have sufficient freeboard and there is a concern of overtopping. This should be rectified and a freeboard limit should be established as a Licence requirement.
- Waste Disposal Lagoon - The existing pump-out chutes were in need of maintenance and as a result sewage has been pumped directly into the lagoon without utilizing the chutes and erosion is evident. This is a matter which needs rectifying. Maintenance should be a priority with all equipment and facilities especially since there is an expected population increase forthcoming.

- Sewage Treatment Facilities - The proposed truck fill discharge pipe is in disrepair and not operating properly. Once again this is a maintenance problem.
- Solid Waste Disposal - There is currently a fence in place for this facility though it is in a state of disrepair. Proper maintenance should be performed at all times. Operational procedures should also be improved and utilize proper techniques as there is a problem with burning and burying of the solid waste.
- An Operation and Management Plan should be required for the Waste Disposal and Sewage Disposal Facilities for the use of operators. This should include regular maintenance of facilities. This plan should be reviewed and approved and there should be a requirement for it to be readily available on site. This is an important issue especially in light of the fact that the facilities appear to be in a state of disrepair.
- Waste Oil Pit - The waste oil pit is being improperly handled. Barrels are on their side and a number are leaking. This should be rectified as soon as possible. Spills are required to be reported and the subsequent clean-up verified as well as how to eliminate or reduce further occurrences.
- There should be a requirement for an Abandonment and Restoration Plan within a certain time frame of a facility being closed (ie 6 months prior to the closing of a waste disposal facility...).
- Sampling requirements and limits on effluent should be established for the various facilities (ie Sewage Effluent Quality Limits should be set in accordance with the "Guidelines for the Discharge of Treated Municipal Wastewater in the NWT")
- There is a need for a general Contingency and Spill Clean-up Plan. This is also another important item considering the current state of disrepair of items within the facilities.

If you have any questions or comments on the above please do not hesitate to contact me at (867) 669-2658 or fax (867) 669-2716.

Sincerely,



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