



Indian and Northern
Affairs Canada

Affaires indiennes
et du Nord Canada

Water Resources Division
Nunavut Regional Office
Indian and Northern Affairs Canada
Iqaluit, NU X0A 0H0

Our File: 9545-3-3HALG / CIDMS 209757
Your File: 3BM-HAL0308

Friday, April 25, 2008

Richard Dwyer
Licence Administrator
Nunavut Water Board
Gjoa Haven, NU X0B 1J0

Re: 3BM-HAL0308, Hamlet of Hall Beach, Qikiqtani Region, Licence Renewal Application

Dear R. Dwyer:

Indian and Northern Affairs Canada (INAC) reviewed the licence renewal application submitted by the Government of Nunavut's Department of Community and Government Services on behalf of the Hamlet of Hall Beach for the 3BM-HAL0308 water licence. The following advice has been provided pursuant to INAC's mandated responsibilities for the enforcement of the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*. Indian and Northern Affairs Canada recommends that the Board consider these comments when reviewing this licence renewal application.

This renewal is to extend, for 5 years, a license that allows for the use of water and the disposal of waste for municipal undertakings by the Hamlet of Hall Beach, situated in the Qikiqtani Region approximately at 68°46' north latitude, 81°12' west longitude.

INAC recommends that an extension of the current water license, retaining the current terms and conditions, if the Hamlet and Community and Government Services agree to bring the Hamlet into compliance with the current terms and conditions of the license for the current wastewater disposal facilities and water use in the community. This extension should be provided in order for the community and its technical support group to provide to the Board an amendment, a revised license application and/or a report dealing with compliance issues.

The following comments are suggested for the Board to recommend to the Hamlet to both assist at the Licensee bringing its facilities into compliance and to amend the renewed license cover all areas of water use and deposit of waste into water.

A. General

1. The Licensee should submit a water licence application supplementary questionnaire, as indicated in item 13 of the Water Licence Application Form, or resubmit the original questionnaire of January 9, 2003 to keep the files complete.
2. The Licensee should review the information communicated in the January 9, 2003 water licence application supplementary questionnaire and make revisions where appropriate (e.g., municipal contacts, daily water consumption rates, abandonment and restoration updates, spill contingency planning, and monitoring program details).
3. The Licensee should commit to:
 - ensure compliance with the terms and conditions in the water license which includes submitting annual reports with all the information required therein as stated in the License (normally listed under Part B); and
 - file any outstanding Annual Reports in accordance with Part B, Item 1 of the 3BM-HAL0308 license, including submitting sample results required by the monitoring program and estimates of volumetric water use.
4. The Licensee should submit a Hazardous Material Handling and Spill Contingency Plan to the Board. This Plan should address both spill prevention and contaminated material recovery measures. Please note that hazardous materials comprises of organic and inorganic substances (e.g., sewage, hydrocarbons, waste oils, and chemicals).
5. The Licensee should submit a general plan for modifications to streams and bodies of water, including crossings, during the life of the license in the annual report to the Board and update the conceptual plan annually.

B. Operation and Maintenance

1. The Licensee should review and update the Plan for the Operation and Maintenance of the Sewage and Solid Waste Disposal Facilities in accordance with the *Guidelines for Preparing an Operation and Maintenance Manual for Sewage and Solid Waste Disposal Facilities* (October 1996) as required in Part F, Item 1 of the 3BM-HAL0308 license within 90 days of the license renewal.
2. Since the Hall Beach wastewater treatment system drains freely (cells are unlined), the renewed license should not require the Municipality to notify the Inspector in advance of a planned decant of the sewage treatment lagoon system.

C. Abandonment and Reclamation

1. The Licensee submitted a Hall Beach Sewage Lagoon Decommissioning Plan (January 2005) as required under Part G, Item 1 of the 3BM-HAL0308 license (submission of Abandonment and Restoration Plans for approval at least six (6) months prior to abandoning any facilities). On April 24, 2007 the Board issued an approval letter for engineering drawings and a tender document for

decommissioning a sewage lagoon under Part E, Item 1 but INAC could not find a summary report of the final decommissioning of the unused cell of the sewage lagoon system within the community of Hall beach (as constructed). The Licensee should be reminded to submit as constructed plans and a summary of work undertaken to the Board.

D. Solid Waste Storage

1. The INAC Inspection reports in 2006 and 2007 had noted piles of un-segregated materials along the shoreline of the stream that runs along and adjacent to both the solid waste management area and the community sewage lagoon. The Inspector's sample results seem to indicate that Run off and/or leachate from the waste area has entered the stream. The Licensee should inform the Board on how they plan to address this water management issue within one year for the Board's review. A summary of the 2007 results are listed below.

Location	Sample Parameter	Result	Guideline	Comment
Raw water: -	Within Canadian Council of Ministers of the environment Guidelines (CCME) Guidelines			
Waste Metal Dump:	Iron	1620 µg/L	300µg/L	High
	Manganese	86.4 µg/L	50 µg/L	High
	Selenium	32.5 µg/L	1 µg/L	High
	Hexane Extractable material	2.7 mg/L	None	Presence of oil and grease
Lagoon	Hexane Extractable material	2.7 mg/L	None	Presence of oil and grease

Note: Fecal and Biological Oxygen Demand samples exceeded the time restrictions on testing, therefore results were not returned from the lab. The samples collected however had a obvious pour of sewage and were green in color.

E. Monitoring Program

1. The Licensee should update within 90 days of the license renewal a written Monitoring Plan to the Board, with a copy to the INAC Inspector. This Plan should address all terms and conditions specified in Part H: Conditions Applying to the Monitoring Program of the 3BM-HAL0308 licence and any other requirements set by the Board. If the Licensee and GN-CGS wish to propose alternative monitoring, the Licensee should be encouraged to provide the Board and the Inspector with justifications for an alternative monitoring program within an appropriate time (by December 31, 2008) for the Board to consider.
2. The Licensee should determine whether it is responsible for submitting a Quality Assurance / Quality Control (QA/QC) Plan for the collection and analysis of water quality samples or implementing a generic QA/QC Plan provided by the Board and provide the plan to the Board. The 3BM-HAL0308 licence has a discrepancy on the approval status of this plan.

- Page 2 of the 3BM-HAL0308 licence states:

“The requirements to develop a QA/QC Plan imposed on the Licensee in this licence are for the purpose of ensuring the NWB that samples taken in the field as part of the Monitoring Program will maintain a high quality, so as

to accurately represent the physical and chemical nature of the samples being taken.”

- Part H, Item 7 of the 3BM-HAL0308 licence states:
“The Licensee shall conform to the Quality Assurance / Quality Control (QA/QC) Plan which shall be provided to the Licensee by the NWB within 60 days of the issuance of this license.”

Again, INAC recommends that an extension of the current water license, retaining the current terms and conditions, if the Hamlet and Community and Government Services agree to bring the Hamlet into compliance with the license. Indian and Northern Affairs Canada requests notification of any changes in the proposed for the Hamlet, as further review may be necessary. Please contact me should you have any questions or comments with regards to the foregoing. I can be reached by telephone at (867) 975-4555 or email at AbernethyD@inac-ainc.gc.ca.

Regards,

Original signed by Jim Rogers

Jim Rogers,
Manager, Water Resources

Carbon copy:

David Abernethy, Regional Coordinator, Water Resources – INAC, NRO
Peter Kusugak, Manager of Field Operations – INAC, NRO