



WATER LICENCE INSPECTION FORM

☒ Original
☐ Follow-Up Report

Licensee		Licensee Representative	
Hamlet of Hall Beach Baffin Region P.O. Box 3 Hall Beach, NU X0A 0K0		Tracy Laine Jack Kammuka – Hamlet Foreman	
Licence No. / Expiry		Representative's Title	
3BM-HAL0810 EXP. May 30, 2010		A/Senior Administrative Officer	
Land / Other Authorizations		Land / Other Authorizations	
Date of Inspection		Inspector	
08/08/2014		A.Keim	
Activities Inspected			
<input type="checkbox"/> Camp	<input type="checkbox"/> Drilling	<input type="checkbox"/> Mining	<input type="checkbox"/> Construction
<input type="checkbox"/> Roads/Hauling	<input type="checkbox"/> Other: Water Discharge	<input checked="" type="checkbox"/> Other: Municipal	<input type="checkbox"/> Reclamation
<input type="checkbox"/> Fuel Storage			

Conditions:		A - Acceptable	C - Concern	U - Unacceptable	NA – Not Applicable	NI – Not Inspected	
Water Use		Condition	Comment	Site Conditions		Condition	Comment
Intake/Screen	NI			Water Management Structures			
Flow Measure. Device	NA			Culverts / Bridges		NA	
Source: Water Supply Lake	A			Drainage		NA	
Water Use:	A			Erosion / Sediment		NA	
Recirculation (y /n)	N			Mitigation Measures		NA	
				Reclamation Activities		NA	
				Materials Storage		A	
Waste Disposal				Signage		C	1
Waste Water	C	1					
Solid Waste	C	1		Monitoring		Other	
Hazardous Waste	C	1		Sample Collection / Analysis			
*The number in the comments field will correspond with specific comments provided below.							
Samples taken by Inspector:			Location(s): Raw Water (Reservoir), Waste Management Area (GPS collected),				
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No							

SECTION 1	<input checked="" type="checkbox"/> Comments (s.__)	<input type="checkbox"/> Non-Compliance with Act or Licence (s.__)	<input type="checkbox"/> Action Required (s.__)
Administration:			
<p>On April 12, 2012 an application for renewal was submitted to the Nunavut Water Board (NWB) on behalf of the Municipality by the Government of Nunavut, Department of Community and Government Services (GN-CGS). That application was rejected by the board for being incomplete. In reviewing the documents found in the application folder on the NWB’s FTP site a number of documents have been submitted since 2010 in support of the application including;</p> <ul style="list-style-type: none">• 2011 Dillon Consulting submitted a number of documents that formed an Operations and Maintenance manual for the Municipalities Solid Waste Facility• 2011 Dillon Consulting submitted a number of documents that formed an Operations and Maintenance manual for the Municipalities Sewage Treatment Facility• In 2012 the GN-CGS filed an annual report on behalf of the Municipality• On August 16th of 2013 a letter from GN-CGS was sent to the NWB outlining the documents and plans the Government had filed over the last three years with respect to the renewal application for the licensee and outlined a number of documents filed on their behalf by a new consultant EXP.• On August 23rd of 2013 the GN again submitted a number of documents to augment and support the previously submitted application package earlier rejected by the Board. That correspondence referred to the new information as both in support of and to supersede previously provided documents.• On February 10th 2014 the GN-CGS wrote to the Nunavut Water Board requesting the board remove some of the monitoring elements of the expired water license and moving forward into any further renewal license that the board may issue. <p>To date the GN-CGS has not fully fulfilled the requirements contained within the now expired license nor those contained within the Compliance Plan submitted to the Inspector in 2012.</p> <p>On March 22nd, 2014 the GN-CGS was advised by Inspector J. Hack in written correspondence related to this file that the GN had not fulfilled their obligations.</p> <p>Following that, on the 24th of March, 2014 the GN-CGS confirmed to the Inspector that the required O&M manuals are not prepared nor is there any plans to have them prepared going forward.</p> <p>In April of 2014 Inspector Hack provided the GN with an outline of what items in the compliance plans (Municipal Water License)</p>			



remain outstanding and are required in order for the Municipality and the GN-CGS to achieve compliance.

To date the Inspector has not received any further feedback nor follow-up from the GN-CGS or the licensee.

More recently, It is unclear, given what can be found on the Nunavut Water Board (NWB)'s FTP site, at what stage the NWB is at with respect to conducting a completeness or conformity review of the documents associated with the renewal application.

The NWB has sent correspondence to the AANDC Inspector with respect to the Direction and conformity with the Compliance plans. This correspondence was answered in September of 2014 and indicated that the Licensee remains in non-compliance with the issued license and the submitted Compliance Plan.

Inspection

Water Use:

The Raw water usage for the community on the date of the Inspection was available for review.

The Water Supply (reservoir) is fed by an adjacent lake and river system that feeds Reservoir lake through a Large gate valve. Water from the Reservoir Lake is then pumped up into a second manmade Reservoir that holds sufficient stores for the community and the Fox main North Warning system site for one year.

The water intake was found free of litter and in operation. Chlorination records were available for review at the Main hamlet garage and were reviewed during the inspection.

Signage continues to be an issue for the Municipality. Some places had no signage, while others had seen their sign posts moved or not installed at the correct locations.

Waste Disposal:

Waste Water Treatment Facilities:

A site visit to the two cell lagoon system was conducted with Jake Kammuka, the hamlet foreman. Again this past winter the community ran out of space in cell two and was required to put effluent from the community into cell 1 (the cell that continues to leak). It was estimated during the period of Inspection that again this past winter and into spring the community put approximately 10 million litres of raw effluent into the lagoon that leaked out through holes in the floor and wall of the lagoon system. The effluent then ran down gradient directly to the ocean approximately 500 m east.

In 2012 and 2013 Inspections of the facility were conducted and documented for the Licensee, the Nunavut Water Board and the Government of Nunavut. In 2012 an Inspectors Direction was issued to compel the Licensee and the Government of Nunavut to Act on this issue and prevent the annual release of raw sewage into the environment. As of the timing of this past inspection it is unclear what actions have been undertaken to address this issue.

Two large sink holes have developed on the South side of the lagoon cell and evidence of washing out from the lagoon is evident along the side walls and surface of the ground below the toes of the lagoon.

It is unclear how long the Government of Nunavut and the license will allow this to continue for.

Solid waste Management

During the period of Inspection the Municipal Waste Management Area was inspected.

Noted in the area was a spot adjacent to the Municipal burn and bury where a fenced area approximately 10 M by 10 Meters has been set up. The fencing material used was made of galvanized metal. No waste had been deposited within the new site during the period of Inspection.

The bulk metals site remains un-segregated and new materials have been building up in new locations at the bulk metals area and adjacent to the municipal waste management site.

Waste management in hall beach remains a large issue for the community.

Hazardous wastes:

During the period of Inspection it was noted by the Inspector that drums of waste oil and other hazardous chemicals had been consolidated on a lined area adjacent to the foreshore of the ocean east of the community. This segregation of hazardous wastes is a very positive step toward properly managing the wastes generated in the community.

Samples were collected at both the Municipal waste management area as well as the site located downstream of cell two of the community lagoon system.

It is unclear where batteries or other hazardous wastes are being stored by the hamlet foreman indicated that they are working on a plan to address Batteries and paint cases this summer.

Non-compliance related to the now expired license;

- Part B (1a through i) Failure to submit complete and accurate Annual reports
- Part B (2) Failure to fully comply with the Monitoring Program
- Part B (5) Failure to maintain the appropriate signage, Surveillance Network Program (SNP)
- Part D (2) Failure to notify the Inspector as required
- Part D Item (5) Failure to maintain and operate the lagoon to prevent structural failure
- Part D (9) Failure to fence the Waste Management Area as required
- Part F (1) Failure to submit Operation and Maintenance Manuals as required
- Part H Failure to implement the requirements listed under the Monitoring Program

The Nunavut Waters and Nunavut Surface Rights Tribunal Act;

11. (1) Subject to subsection (2), no person shall use, or permit the use of, waters in Nunavut except in accordance with the conditions of a licence.
- (2) Subsection (1) does not apply in respect of
- (a) any unlicensed use of waters that is authorized by the regulations;
 - (b) the use of waters
 - (i) for a domestic purpose, or
 - (ii) for the purpose of extinguishing a fire or, on an emergency basis, controlling or preventing a flood; or
 - (c) the use of waters in a national park.
- (3) Where a person diverts waters for a purpose referred to in subparagraph (2)(b)(ii), the person shall, when the need for the diversion has ceased, discontinue the diversion and, in so far as possible, restore the waters to their original channel.
12. (1) Subject to subsection (2) and except in accordance with the conditions of a licence, no person shall deposit or permit the deposit of waste
- (a) in waters in Nunavut; or
 - (b) in any other place in Nunavut under conditions in which the waste, or any other waste that results from the deposit of that waste, may enter waters in Nunavut.
- (2) Subsection (1) does not apply in respect of
- (a) any unlicensed deposit of waste that is authorized by the regulations; or
 - (b) the deposit of waste in a national park.

Compliance Plan

- B-2. The Government of Nunavut failed to fully implement the monitoring program and submit all sampling results as required.
- B-5. The Licensee and the Government of Nunavut have failed to install signage as required.
- D-5. Development of a Capital plan. A Capital plans has not been submitted to the NWB nor the Inspector as required to fulfill this objective.
- D-6. The Licensee did not conduct an acute lethality test this year as required. (The Gn and the Licensee have proposed to have this removed from the Licensee’s monitoring program,m. However as yet it remains within the license and is required.
- D-8. The Government of Nunavut committed to providing a plan to improve segregation of hazardous wastes. While some work has been done by the licensee the overall solid waste plan and segregation plan have not been submitted to the NWB nor the Inspector.
- H. The Licensee and the Government of Nunavut have failed to adhere to the Monitoring program as required.

Following a review of the documents related to this file found on the Nunavut Water Board’s FTP site submitted by GN-CGS on behalf of the Municipality, and based on observations, documents, photographs and samples collected during the period of the Inspection, The Inspector finds that the GN-CGS and the Municipality of Hall Beach remain in contravention of the terms of the now expired water License and the Nunavut Waters and Nunavut Surface Rights Tribunal Act and the Direction issued to the Government of Nunavut in 2012.

It was however noted during the Inspection that the Municipality has moved ahead on its own over the last year and installed a snow fence on a site adjacent to the Municipal Waste Management Area. While the materials used to erect this faence appear to be of a temporary nature it is a step in the right direction. It is hoped that this coming year a real long term fence will be installed at the site and the temporary snow fence can be removed for other usage.

Signage has not been installed in all areas around the community and at sampling sites. At one location the signage, according to the hamlet foreman, appears to have been removed by people unknown

An Annual Report was submitted by the GN in cooperation with the Municipality. The sampling program however was found to be incomplete.

The Municipality continues to work with infrastructure that is outdated and undersized. Capacity issues continue to plague the community.

Proactive work by the Municipality to start the work necessary to segregate Hazardous materials for shipment off site was a definite improvement in the community.

It is clear that the Municipality has undertaken some effort toward achieving compliance with this License. However after two years it is clear that not enough has been done. The continual and expected failure of the lagoon system in the community for a fourth consecutive year is a huge failure on the part of government and the licensee to achieve compliance, protect the environment and respect the legislation.

Photo Log			
Date	Authorization	Camera	Inspector
August 8 2014	3BM-HAL0810	Sony Cyber shot	A. Keim



Figure 1 Gate Valve - Water Intake



Figure 2 Gate valve



Figure 3 Gate Valve



Figure 4 Raw water source



Figure 5 Chlorination mixing and pumping station in Pump House



Figure 6 Pumping station



Figure 7 Man made reservior



Figure 8 Barrels of hazardous waste on pad adjacent to foreshore and ocean



Figure 9 Lagoon cell - Leaking



Figure 10 Lagoon cell - outside sink hole



Figure 11 Lagoon cell wall -- sink hole



Figure 12 Fencing installed close to Municipal Waste Management Area



Figure 13 Fencing



Figure 14 Fencing

Licensee or Representative	Inspector's Name
	A.Keim
Signature	Signature
	Sent by Email- original On file
Date	Date
	October 28, 2014

Office Use Only:	Follow-up report to be issued by Inspector	<input type="checkbox"/> Yes <input type="checkbox"/> No
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