

File No.: 3BM-HAL1520

June 7, 2018

Jim Langille Senior Administrative Officer Hamlet of Hall Beach P.O. Box 3 Hall Beach, NU XOA 0K0 Bhabesh Roy, M.A.Sc., P.Eng. Municipal Engineer Community and Government Services Baffin Region, Government of Nunavut P.O. Box 379, Pond Inlet, NU XOA 0S0

Email: <u>sao\_hbhamlet@qiniq.com</u> Email: <u>broy@gov.nu.ca</u>

RE: NWB Technical Review of 2017 Annual Report for the Hamlet of Hall Beach; Water Licence No. 3BM-HAL1520

Dear Mr. Langille:

The Nunavut Water Board (NWB) has completed a technical review of the 2017 Annual Report.

On March 21, 2018, the NWB acknowledged receipt of the Annual Report and provided it to the Qikiqtani distribution list for information. No comments have been received to date.

The technical review of the Annual Report found that it did not meet the requirements of the Licence. The Licensee should refer to their Licence and review all Licence conditions to ensure that reporting, inspecting, and monitoring are compliant with the Licence. If, for some reason, data or information is not available, include the Licensee should include a discussion indicating:

- What information is missing;
- Why it was not provided; and
- Steps being made to provide it in the future.

Feedback on the Annual Report as submitted includes:

• Annual Report Section i-ii:

The table of information provided is from the 'On Tap Water Delivery System'. The information is provided in litres.

Licence Part H, Item 2 requires that the Licensee measure and record, in cubic metres, the monthly and annual quantities of Water pumped at Monitoring Program Station HAL-

1, for all purposes. Monitoring Program Station HAL-1 is defined (under Part H, Item 1) as Raw water supply intake at the Water Supply Lake.

The information in the Annual Report Section i-ii should be in cubic metres and it should be a measurement of the water withdrawn from the environment rather than the water distributed to the community. For Hall Beach, the point of withdrawal (as part C, Item 1 of the Licence) is Water Supply Lake.

## • Annual Report Section vii:

The Annual Report discusses an application for amendment that is before the NWB. No other studies are mentioned.

The NWB acknowledges that an application was before the NWB at the time of writing of the Annual Report. The NWB notes that since that time the Licensee withdrew the application.

## • Annual Report Section ix:

The Annual Report states that the Hamlet is operating from existing Operation and Maintenance Plans and will be updating the plan for Sewage Lagoon Cell-1 soon.

Licence Amendment 1 Part F, Item 9, requires that the Licensee update the document entitled Hamlet of Hall Beach, Sewage Treatment Facility Operation and Maintenance Manual and that it be submitted with the 2015 Annual Report.

To date, the NWB has no record of receiving this information which was due on March 31, 2016.

Licence Part F, Item 3 requires that the Licensee submit to the Board for approval, within ninety (90) days following issuance of the Licence, an Operations and Maintenance Manual for the Water Supply Facility developed in accordance with applicable guidelines.

To date, the NWB has no record of receiving this information which was due on July 29, 2015.

## • Annual Report Section x:

The Annual Report states that the Hamlet has started extended Water sampling and testing program and that they are now in compliance.

The Annual Report does not include any sampling or testing data or an explanation for why that data is missing. The Annual Report itself indicates non-compliances. As well, the 2017 INAC Inspection Report indicates non-compliances.

The Licensee should ensure that statements in the Annual Report are backed up by data presented in the Annual Report.

After Annual Report Section xi:

The Annual Report states that the Lab Test results for 2017 are submitted in a separate document.

The separate document provided, titled 2014-2016 Wastewater Testing, only includes data from 2014 to 2016. No data from 2017 was provided. The data is also labelled using local names for sampling sites rather than the Monitoring Program Station names from the License.

The NWB strongly recommends that the Licensee address issues identified in 2017 by the Inspector<sup>1</sup>. Please provide a brief summary of work done to address concerns or deficiencies listed in the inspection reports and/or compliance reports prepared by an Inspector or other parties in the 2018 Annual Report.

Should you have any questions, please feel free to contact me, Dave Baines, at (867) 360-6338 (extension 29), at your earliest convenience.

Sincerely,
Dave Baines
Nunavut Water Board, Technical Advisor
Technical Advisor

Cc: Distribution List – Qikiqtani

<sup>&</sup>lt;sup>1</sup> Indigenous and Northern Affairs Canada (INAC) Inspection Report, October 4, 2017.