

From: Derek Donald [derek.donald@nwb-oen.ca]
Sent: March 20, 2019 3:15 PM
To: Roy, Bhabesh; saokim@qiniq.com
Cc: Licensing Department
Subject: 3BM-KIM0911 Response to Comments and Submission

Hi Bhabesh

Thank you for the submitted information related to 3BM-KIM0911. I have reviewed the submission and found that there are a few pieces of information still missing.

1. QA/QC Plan:

- a. A letter from the laboratory confirming their acceptance of the QA/QC Plan, similar to the one provided for Cape Dorset (attached for reference),

Ans. : Attached.

- b. Errata outlined in ECCC comments that still need to be addressed:

- i. Section 1.4, "condition 20 of Part H" should read "Condition 11 of part H";

Ans. Yes, It is Corrected.

- ii. Section 1.7, CALA refers to the Canadian Association for Laboratory Accreditation, formally known as the Canadian Association of Environmental Analytical laboratories (CAEAL)." – This should be "**formerly**". This error is also in section 3.1.

Ans.: It is corrected

2. Waste Water O&M Manual:

- a. Section 3.4.4 is still unclear with respect to monitoring frequency and the number of site monitored. It indicates daily monitoring and sampling of multiple sites, but elsewhere in the plan it indicates that sampling at KIM-3 once a month is the practice. Please clarify this section.

Ans. KIM-3 is the only sampling point and sampling is done monthly from May to August as long as the flow is observed.

- b. Please provide the coordinates of the sewage discharge location "In the event of any disruption of services, due to blizzard or truck breakdown"

Ans.: "In the event of any disruption of services, due to blizzard or truck breakdown", normally sewage is not collected from the sewage tank of any building. Wait until the blizzard is over. In case of truck breakdown, arrangement is made to accelerate repairing the truck chartering a Technician from the South on emergency basis. Truck Sewage is dumped next to the Monitoring Point KIM-3.

3. Solid Waste Management Plan

- a. Open burning was recommended by ECCC to be minimized, but in the Plan it is recommended to occur weekly, please update the plan accordingly,

Ans. Open burning is done during summer season only. Since this site is close to the Community and next to PPD compound, the open burning is done on a small amount of wastes for a very short duration. It means frequent but little amount to reduce the burning time and volume so that there is hardly any impact to the environment.

b. As recommended by CIRNAC, the Plan should indicate that hazardous waste should be segregated and placed into secondary containment, that the landfill should be bermed, and that signage and fencing be put in place.

Ans. Hamlet is working on these items and planning to store hazardous wastes in the sea can for future disposal to the South, repairing fencing and replacing signage . A consultant is engaged on the feasibility study of Community wastes management. Following this study, a detailed design will be prepared for the new site and a decommissioning plan will be presented to abandon this existing facility.

4. Please confirm that you are okay with the 30,000 cubic metres water use limit for the next 10 years.

Ans. Based on the population growth in 2029, water consumption volume is required to be calculated based on the standard mathematical equation used in Nunavut and NWT for the population less than 2000 and the volume of the annual water extraction permit should be fixed according.

I think annual permit 35,000 cubic meters is a good and safe figure. Extraction volume varies and depends on annual dust control program. Since no meter does exist at the WTF, the consumption volume is accurately recorded from the Truck delivery chart.

5. Could you provide an annual report for 2016 that includes water use volume.

The correct annual consumption volume in 2014= 20,946,941.76 litres; 2015=19,248,145.55 litres; 2016 = 860,528.30 litres is wrongly reported, the correct figure after audit corrected to 18,093,106.60;2017=18,238.415.50litres; and 2018=18,123,304.00litres. The annual consumption report of 2016 is attached.

Please provide the requested information by **March 27, 2019**, or indicate when it will be submitted.

Thank you,
Derek