

Megan Porter < megan.porter@nwb-oen.ca>

Fwd: 131211 3BM-KIM0911 Renewal Application, Request for Comments

Phyllis Beaulieu <phyllis.beaulieu@nwb-oen.ca>
To: Megan Porter <megan.porter@nwb-oen.ca>

Mon, Dec 16, 2013 at 10:41 AM

FOR YOUR FILE AND ACTION



Phyllis Beaulieu- & < > < >

Manager of Licensing- Responsable des permis

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NUNAVUT WATER BOARD - OFFICE DES EAUX DU NUNAVUT • ልይሩ ልL ር ፌትና ቴበLት ዣ - NUNAVUT IMALIRIYIN KATIMAYINGI www.nwb-oen.ca

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------ Forwarded message -----From: **Torng, Allan** <ATorng@gov.nu.ca>
Date: Fri, Dec 13, 2013 at 11:23 AM

Subject: RE: 131211 3BM-KIM0911 Renewal Application, Request for Comments

To: Phyllis Beaulieu <phyllis.beaulieu@nwb-oen.ca>

Cc: "Klassen, Ken" <KKlassen@gov.nu.ca>, "Joy, Wanda" <WJoy@gov.nu.ca>, "Hutchison, Kristine" <KHutchinson@gov.nu.ca>, "Baikie, Maureen"

<MBaikie@gov.nu.ca>

Phyllis,

As requested, please find below our review comments on the Hamlet of Kimmirut's renewal application for a water license.

1. The Annual Municipal Reports to Water Board (dated 2011 and 2012) indicated that the 'quantity of water obtained from all sources' was derived from the 'quantities of water used' as reported in the Hamlet's 'On Tap Water Delivery System'. Further, both documents reported that the 'quantity of water obtained from all sources' and 'quantity of sewage waste discharged' were the 'same'.

<u>Comment</u>: We think that the reported 'quantity of water obtained from all sources' and 'quantity of sewage waste discharged' may be underestimated, and, therefore, those number(s) should be re-evaluated. Other sources of liquids should be considered [e.g., milk, soda drinks, and other prepackaged beverages that are purchased (or brought in) and consumed by the residents]. Thus, the reported 'quantity of sewage waste discharged' may not be reliable for determining the wastewater holding capacity for the proposed (upper and lower) lagoons].

2. In the "130823 3BM-KIM0911 Cover Letter-IAAE", it was mentioned that "the lower berm" of the new sewage lagoon was "experiencing seepage".

Questions: What is the likelihood of seepage, overflow, or direct discharge of the wastewater from the lagoons into Fundo Lake, i.e., after the lagoons are completed and commissioned? What is the alternative method(s) of sewage disposal in such an adverse event?

<u>Recommendation</u>: A risk management plan (RMP) that includes monitoring for seepage or overflow, and spill contingency plan should be in place to address that potential concern/scenario. A secondary water source should be identified if, in the future, there is a seepage from the lagoons [particularly, if the seepage from the lagoon(s) should impact the water quality of the primary water source (Lake Fundo)]. Further, a copy of the

RMP should be copied to the Environmental Health Officer at the Igaluit Public Health Unit.

- 3. Given the close proximity of the above ground fuel storage tank (at the water treatment/fill-up station) to the primary water source (Fundo Lake), and the potential fuel spills and impact on that lake, we would recommend that the Environmental Code of Practice for above ground storage tank systems for containing petroleum and allied petroleum products be applied (http://www.ec.gc.ca/lcpe-cepa/default.asp?lang=En&n=61B26EE8-1&printfullpage=true#ws5F0F3299). In particular, it is recommended that the following documentations be prepared and made available to mitigate potential fuel spills at the water treatment plant:
 - a. Fuel Spill Response Plan should include a
 - i. map showing the fuel storage relative to that water source,
 - ii. list the available spill response equipment and kits,
 - iii. monitoring and reporting procedures,
 - iv. procedure(s) for dealing with fuel spills, etc.
 - b. Fuel Storage and Management Plan should include the best management practices for the operation and maintenance procedures for the above ground fuel storage tank. Further, the Hamlet's utility/operations personnel should be trained and familiar with the prescribed practices and procedures that are stipulated in both Plans. Further, a copy of the Plan(s) should be copied to the Environmental Health Officer at the Iqaluit Public Health Unit.
- 4. Given the fact that the Hamlet of Kimmirut currently has its sewage/wastewater (w/w) discharge site at the existing solid waste disposal facility,
 - a. What is the abandonment and restoration (closure) plan for that sewage effluent discharge site (at the existing solid waste disposal facility), i.e., after the lagoons are commissioned?
 - b. Further, what actions will be taken to decontaminate the affected ground and subsurface areas that are impacted by the w/w effluent discharge site and its (runoff) pathway from the solid waste disposal facility to the ocean (see attached pictures, i.e., S1280015 w/w discharge site, and S1280016 runoff pathway of the w/w effluent flow from the solid waste disposal facility to the ocean)?
- 5. After the lagoons are commissioned, what are the operation and maintenance plans for that sewage disposal facility?
- 6. What are the possible (or potential) sources of contamination of the primary water source (Fundo Lake), and what steps are taken by the Hamlet of Kimmirut to mitigate contamination of Fundo Lake?
- 7. What is the status of the operation and maintenance (O&M) manual for the water supply, treatment, and distribution operations? Please send a copy of that O&M manual to the Environmental Health Officer at the Iqaluit Public Health Unit.

Allan Torng, MSc, MPM, CPHI(C)

Environmental Health Officer

Igaluit Public Health Unit

Department of Health

P.O. Box 1000, Station 1031

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From: Phyllis Beaulieu [mailto:phyllis.beaulieu@nwb-oen.ca]

Sent: Wednesday, December 11, 2013 1:18 PM

To: Roy, Bhabesh; Hamlet of Kimmirut

Cc: Ruediger, Ralph; Toonoo, Timoon; Westwell, Bill; NWB Karlette Tunaley Subject: 131211 3BM-KIM0911 Renewal Application, Request for Comments

TO ALL PARTIES:

Please review the attached letter and Notices related to the Hamlet of Kimmirut's renewal application for a water license.

Please note the deadline for comments is January 11, 2014.

Regards,

2 attachments



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