



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

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## RE: 3BM-KUG0914 Application for Renewal Amendment

1 message

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**Alam, Shah** <SAlam@gov.nu.ca>

Thu, Nov 13, 2014 at 9:17 PM

To: Sonia Aredes <sonia.aredes@nwb-oen.ca>

Cc: Phyllis Beaulieu <phyllis.beaulieu@nwb-oen.ca>, David Hohnstein <david.hohnstein@nwb-oen.ca>, "Niptanatiak, Kevin" <KNiptanatiak@gov.nu.ca>, "Slifka, Shane" <SSlifka@gov.nu.ca>

Good evening Sonia,

Thanks for your reply and bringing so old information and requests, even a period before the current expired Water Licence issued. We have come to a joint discussion conclusion through our conferences in last year to help communities Water Licences updating with possible information updating, not much thinking of unavailable outdated information which might not be useful very much. In consideration for expired Water Licence amendment which been issued after 2008, it is more important for monitoring & reporting of ongoing years after the issuance, instead of back dated reports (if not addressed particularly).

CGS has tried even to update those information for the shake of system, but could not imagine if no information available in the server or with the Licensee. Most of the community didn't keep proper records or computer software/folders of those old information.

I realize that we can have a teleconference with you, NWB, myself, SAO of Kugluktuk and AANDC inspector (if available) sometime in the following week (Wednesday-Friday), so that we can discuss every item and every single deficiency as reported, requested and responded through the submission/compliance plan. I will appreciate to consider this professionally not only affected Licensee or Administrative way. Please feel free to advise me your availability. I will try to get hold our Regional Director and/or Director of Infrastructure operation if requires.

Best wishes,

Shah Alam

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**From:** Sonia Aredes [[sonia.aredes@nwb-oen.ca](mailto:sonia.aredes@nwb-oen.ca)]

**Sent:** November 13, 2014 4:41 PM

**To:** Alam, Shah

**Cc:** Phyllis Beaulieu; David Hohnstein

**Subject:** 3BM-KUG0914 Application for Renewal Amendment

Dear Shah:

Thank you for your emails dated October 24 and October 31, 2014, which addressed the concerns expressed by NWB in a letter, dated August 26, 2014.

I conducted a review of the submitted documents and have found two deficiencies that must be addressed before the Renewal Application can be considered complete: 1) The absence of an updated Spill Contingency Plan and 2) Inconsistencies between the Hamlets's declared status of compliance, and the 2014 Inspection Report status of compliance, submitted by ANNDC.

1) 1)

The Hamlet of Kugluktuk Environmental Emergency Contingency Plan (2007) states that the Hamlet should annually review and update the information contained in the Plan; so far, no updates of the EECF have been presented.

Additionally, as per part F Item 1c of the Water Licence, the Hamlet must submit an "expanded Spill Contingency Plan which describes all chemicals and fuels stored by the Hamlet, their locations and quantities". The Plan shall also take into consideration, but not restricted to, comments received during the 2008 application review process, such as:

- • The Plan should include a list of available spill response equipment and the name of trained personnel who will be on-site and available in the case of a spill, and
- • will implement the use of secondary containments or surface liners where storage/transfer of hazardous fluids take place.
- • In addition, the Plan must address proposed response plans / mitigation measures for spills which could threaten the health of the Hamlet water source; such as those which originate either from the uphill waste storage (Qulliq Energy waste storage) or from trespassers.

2)

In regards to the Compliance Plan, the Hamlet's declared status of compliance differs substantially from the status of compliance reported by the AANDC Inspector in the 2014 Inspection Report. A spread sheet is attached showing the differences. Given the importance of The Compliance Plan to the renewal process, it is important that the noted deficiencies in the Plan be addressed before the Renewal Application can continue.

Once the Compliance Plan is reviewed, updated and presented along with an updated Spill Contingency Plan, the Application will proceed to the next stage of the Licence process.

Please, do not hesitate to contact me for any question related to the Application.

Regards

Sonia