



P.O. Box 119  
Gjoa Haven, NU X0B 1J0  
Tel: (867) 360-6338  
Fax: (867) 360-6369

NUNAVUT WATER BOARD  
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NUNAVUT IMALIRIYIN KATIMAYINGI  
OFFICE DES EAUX DU NUNAVUT

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# Draft Document for review

NWB Guide:

Development of a Plan for Compliance

Date of Issuance: June 2010

## DOCUMENT CONTROL

Original Guide Date: June 2010

Guide Amendments:

# Draft Document for review

No.	Description	Date
1	Initial Release	14-Jun-10
2		
3		
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## BACKGROUND INFORMATION

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#### What is a Plan for Compliance:

A Plan for Compliance is a document, submitted to the Board for review and approval as a condition of a water licence. This Plan must demonstrate the measures the licensee will undertake, including an implementation schedule, to achieve full compliance with the conditions of a water licence, taking into consideration the issues raised in any inspector reports and/or directions, along with the full commitment of the Licensee.

Upon approval of the Plan by the Board, the Plan will effectively become a part of the of the licence (a condition) as required by the following standard water licence condition:

*"Every Plan to be carried out pursuant to the terms and conditions of this Licence shall become a part of this Licence, and any additional terms and condition imposed upon approval of a Plan by the Board become part of this Licence. All terms and conditions of the Licence should be contemplated in the development of a Plan where appropriate." Note: The condition may vary depending on the Licence issued.*

#### Why is a Plan for Compliance required:

The NWB may require the submission of a Plan for Compliance where compliance issues have been identified during (or before) water licence renewals and/or amendments for projects. Requiring the submission of a Plan for Compliance to the Board for review and approval allows the Board (and enforcement) to carefully monitor a licensee's efforts to come into compliance with their Licence.

The NWB uses the Plan for Compliance to fulfill its legislative obligation under section 57(a)(b) of the NWSRTA, in assessing an application for a new, renewal or amendment Licence.

#### Who Submits the Plan for Compliance:

Preparation and submission of the Plan for Compliance is the responsibility of the Licensee. If the Plan is prepared by a consultant or third party on behalf of the licensee, it must be accompanied by a signed letter which authorizes a party to be the licensee's representative and demonstrates the licensee's commitment to implement the Plan.

#### When is a Plan for Compliance Required:

The Plan for Compliance must be submitted within a time period specified in the licence or as requested by the NWB. Upon receipt of the Plan for Compliance, the NWB will provide notice of the Plan to interested parties for review and comment. The Board will consider the submissions of parties and their comments in its decision on whether or not to approve the Plan and notify the Licensee of its decision.

#### How to Prepare a Plan for Compliance:

To assist the licensee in its preparation of a Plan for Compliance, the NWB has developed a **Plan for Compliance Template** located in the template tab of this Guide and provides the following advice for the completion of this template.

The **Plan for Compliance Template** is a table with the following six (6) columns: (1) Licence Condition; (2) Status of Compliance; (3) Short Term Plan for Compliance; (4) Schedule for Implementation of Short Term Plan for Compliance (including funding status where applicable to municipal developments); (5) Long Term Plan for Compliance; and (6) Schedule for Implementation of Long Term Plan for Compliance (including funding status where applicable to municipal developments).

To complete the **first column** (Licence Condition), the licensee is required to copy each of the terms and conditions of its licence and subsequent amendments into separate cells in the first column of the table. The template provides a list of examples of terms and conditions, however it is the licensee's responsibility to ensure that all relevant terms and conditions of its licence are included in this column and to add/delete/modify where applicable.

To complete the **second column** (Status of Compliance), the licensee must consider Inspection reports, Inspector's directions, NWB correspondence, and correspondence and comments from the parties, in making a determination of the status of compliance. Columns 3, 4, 5 and 6 must be further considered for each licence condition that has been determined to be in non-compliance.

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To complete the **third column** (Short Term Plan for Compliance) the licensee must provide the information that indicates the plan to come into compliance with the licence condition prior to the expiry of the licence (if documents are to be provided, when? Submission of reports, prepared O&M Manuals etc.).

Where a Short Term Plan for Compliance cannot be achieved within the licence term or is considered only as a temporary measure, the Licensee must complete the fifth column (Long Term Plan for Compliance).

Firm timetables for implementation of the **Short and Long Term Plans for Compliance** must be provided in **columns 4 and 6** respectively. Where timetables for implementation are dependent upon sufficient funding (ie. municipalities), the licensee must provide an indication of the status of the funding required to carry out the Plan and an estimated timeframe for receipt of the necessary funding (where Capital Planning is required for a given funding period).

### Enforcement of a Licence:

The NWNSRTA provides for enforcement measures and penalties as well as the designation of qualified inspectors and analysts to facilitate such enforcement measures and penalties. Inspectors and analysts are designated by INAC. The Licence and conditions contained within are subject to enforcement, including fines and/or imprisonment. (For a more detailed explanation on the enforcement of a Licence and the conditions contained within a Licence, please refer to sections 85 and 90 of the NWNSRTA and the NWB Guide 7 Licensee Requirements Following the Issuance of a Licence, April 2010.)

# PLAN FOR COMPLIANCE

LICENCE NO. 3BM-[ABC1010]

LICENSEE: COMPANY, CGS OR HAMLET OF [INSERT NAME]

DATE OF ISSUANCE:

DATE OF EXPIRY:

AMENDMENTS ISSUED:

DATE:

REASON:

DATE OF PREPARATION:

PREPARED BY:

PRINTED

SIGNATURE

DATE OF SUBMISSION: \_\_\_\_\_

## PLAN FOR COMPLIANCE LICENCE NO. 3BM-ABC1010

### PLAN FOR COMPLIANCE TEMPLATE

Column 1		Column 2	Column 3	Column 4	Column 5	Column 6
Licence Condition (add or delete as required)		Status of Compliance	Short Term Plan for Compliance	Schedule for Implementation of Short Term Plan for Compliance (including funding status where applicable to municipal developments)	Long Term Plan for Compliance	Schedule for Implementation of Long Term Plan for Compliance (including funding status where applicable to municipal developments)
Part B:	General Conditions					
B - 1	The Licensee shall file an Annual Report with the Board not later than March 31st of the year following the calendar year reported which shall contain the following information:					
B - 1 - a	tabular summaries of all data generated under the "Monitoring Program";		Draft Document for review			
B - 1 - b	modifications to the "Monitoring Program";					
B - 1 - c	the monthly and annual quantities in cubic metres of fresh water obtained at the Water Supply Facilities;					
B - 1 - d	the monthly and annual quantities in cubic metres of each and all waste discharged;					
B - 1 - e	the annual quantity in cubic meters and tones of sludge removed from the Sewage Disposal Facility along with the treatment, storage, and disposal provided;					
B - 1 - f	the results of sampling and analyses of sewage sludge;					
B,1 - g	a summary of modifications and/or major maintenance work carried out on the Water Supply and Waste Disposal Facilities, including all associated structures and facilities;					
B - 1 - h	a list of unauthorized discharges and summary of follow-up action taken;					
B - 1 - i	a summary of any abandonment and restoration work completed during the year and an outline of any work anticipated for the next year;					
B - 1 - j	any updates or revisions for manuals and plans as required by changes in operation and/or technology;					
B - 1 - k	detailed minutes of any public consultation and participation with local organizations and the residents of the community regarding licence amendments;					
B - 1 - l	a summary of any studies or reports requested by the Board that relate to water use and waste disposal or restoration, and a brief description of any future studies planned; and					

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B - 1 - m	any other details on water use or waste disposal requested by the Board by November 1st of the year being reported.					
B - 2	The Licensee shall comply with the "Monitoring Program" described in this Licence, and any amendments to the "Monitoring Program" as may be made from time to time, pursuant to the conditions of this Licence.					
B - 3	The "Monitoring Program" and compliance dates specified in the Licence may be modified at the discretion of the Board.					
B - 4	Meters, devices or other such methods used for measuring the volumes of water used and waste discharged shall be installed, operated and maintained by the Licensee.		<b>Draft Document for review</b>			
B,5	The Licensee shall, within ninety (90) days after the first visit by the Inspector following issuance of this Licence, post the necessary signs to identify the stations of the "Monitoring Program". All signage postings shall be in the Official Languages of Nunavut.					
B - 6	The Licensee shall post signs in the appropriate areas to inform the public of the location					
B - 7	The Licensee shall immediately report to the 24-Hour Spill Report Line (867-920-8130) any spills of Waste, which are reported to, or observed by the Licensee, within the municipal boundaries or in the areas of the Water Supply or Waste Disposal Facilities.					

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<p>B - 8</p> <p>The Licensee shall ensure a copy of this Licence is maintained at the Municipal Office at all times. Any communication with respect to this Licence shall be made in writing to the attention of:</p> <p>(a) Manager of Licensing: Nunavut Water Board P.O. Box 119 Gjoa Haven, NU X0B 1J0 Telephone: (867) 360-6338 Fax: (867) 360-6369 Email: <a href="mailto:licensing@nunavutwaterboard.org">licensing@nunavutwaterboard.org</a></p> <p>(b) Inspector Contact: Water Resources Officer Nunavut District, Nunavut Region P.O. Box 100 Iqaluit, NU X0A 0H0 Telephone: (867) 975-4295 Fax: (867) 979-6445</p> <p>(c) Analyst Contact: Taiga Laboratories Department of Indian and Northern Affairs 4601 – 52 Avenue, P.O. Box 1500 Yellowknife, NT X1A 2R3 Telephone: (867) 669-2781 Fax: (867) 669-2718</p>					
<p>B - 9</p> <p>The Licensee shall submit one paper copy and one electronic copy of all reports, studies, and plans to the Board. Reports or studies submitted to the Board by the Licensee shall include a detailed executive summary in Inuktitut.</p>					
<p>B - 10</p> <p>The Licensee shall ensure that all document(s) and correspondence submitted by the Licensee, to the Board, are received and acknowledged by the Manager of Licensing.</p>		<b>Draft Document for review</b>			
<p>B - 11</p> <p>The Licensee shall, for all Plans submitted under this Licence, include a proposed timetable for implementation. Plans submitted, cannot be undertaken without subsequent written Board approval and direction. The Board may alter or modify a Plan if necessary to achieve the legislative objectives and will notify the Licensee in writing of acceptance, rejection or alteration of the Plan.</p>					



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B - 12	The Licensee shall, for all Plans submitted under this Licence, implement the Plan as approved by the Board in writing.					
B - 13	Every Plan to be carried out pursuant to the terms and conditions of this Licence shall become a part of this Licence, and any additional terms and condition imposed upon approval of a Plan by the Board become part of this Licence. All terms and conditions of the Licence should be contemplated in the development of a Plan where appropriate.					
B - 14	This Licence is not assignable except as provided in Section 44 of the Act.					
Part C:	<u>Conditions Applying to Water Use</u>					
C - 1	The Licensee shall obtain all fresh water from [Name of Source or LocationXXXXXX Lake using the Water Supply Facilities or as otherwise approved by the Board in writing.					
C - 2	The annual quantity of water, used for all purposes, shall not exceed XXXXX cubic metres.					
C - 3	The Licensee shall equip all water intake hoses with a screen of an appropriate mesh size to ensure that fish are not entrained and shall withdraw water at a rate such that fish do not become impinged on the screen.					
C - 4	The Licensee shall not remove any material from below the ordinary high water mark of any water body unless otherwise approved by the Board in writing.					
C - 5	The Licensee shall not cause erosion to the banks of any body of water and shall provide necessary controls to prevent such erosion.					
C - 6	Sediment and erosion control measures shall be implemented prior to and maintained during the operation to prevent entry of sediment into water.		<b>Draft Document for review</b>			

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Part D:	<u>Conditions Applying to Waste Disposal</u>					
D - 1	All Effluent discharged from the Sewage Disposal Facility at Monitoring Program Station ABC-X shall not exceed the following Effluent quality limits: (see licence).					
D - 2	A Freeboard limit of 1.0 meter, or as recommended by a qualified geotechnical Engineer and as approved by the Board in writing, shall be maintained at all dams, dykes, or structures intended to contain, withhold, divert or retain water or wastes.		<b>Draft Document for review</b>			
D - 3	The Licensee shall provide at least ten (10) days notification to an Inspector, prior to initiating any decant of the sewage lagoon.					
D - 4	The Sewage Disposal Facility shall be maintained and operated, in such a manner as to prevent structural failure.					
D - 5	The Licensee shall dispose of and permanently contain all Solid Wastes at the Solid Waste Disposal Facility or as otherwise approved by the Board in writing.					
D - 6	The Licensee shall segregate and store all hazardous materials and/or hazardous waste, including waste oil, within the Solid Waste Disposal Facility in a manner as to prevent the deposit of deleterious substances into any water until such a time as proper disposal arrangements are made.					
D - 7	The Licensee shall implement measures to control wind-blown litter at the Solid Waste Disposal Facility.					
D - 8	The Licensee shall use clean material for construction, operation, and maintenance activities that is obtained from an approved source and which has been demonstrated not to produce acid rock drainage and to be non-metal leaching.					

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D - 9	For any approved source of material within the municipality, the Licensee shall submit to the Board for approval sixty (60) following licence issuance, a quarry management plan that includes the following: a. Confirmation that the quarry material does not produce acid rock drainage and is non-metal leaching; b. An assessment of any potential impacts to freshwater quality; and c. Mitigation measures.					
Part E:	<u>Conditions Applying to Modification and Construction</u>					
E - 1	The Licensee shall implement the recommended options identified in the Water Licence Application document entitled Recommended Sewage Treatment Upgrades for the Hamlet of NAME dated DATE, and shall follow the design as provided in the signed and stamped drawings numbered #, # and #, dated DATE (Consultant Name, Project No. ####). In the event of a conflict between the conditions of this Licence and the above referenced document, the conditions of this Licence shall prevail.		Draft Document for review			
E - 2	The Licensee shall submit to the Board for approval, design drawings stamped and signed by a qualified engineer registered in Nunavut, 6 months prior to the construction of any dams, dykes or structures intended to contain, withhold, divert or retain water or wastes.					

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E - 3	The Licensee may, without written approval from the Board, carry out modifications to the Water Supply and Waste Disposal Facilities provided that such modifications are consistent with the terms of this Licence and the following requirements are met: a. the Licensee has notified the Board in writing of such proposed modifications at least sixty (60) days prior to beginning the modifications; b. these modifications do not place the Licensee in contravention of the Licence or the Act; c. the Board has not, during the sixty (60) days following notification of the proposed modifications, informed the Licensee that review of the proposal will require more than sixty (60) days; and d. the Board has not rejected the proposed modifications.					
E - 4	Modifications for which all of the conditions referred to in Part E, Item 3, have not been met, may only be carried out upon written approval from the Board. The Licensee shall provide as-built plans and drawings of the Modifications referred to in this Licence within ninety (90) days of completion of the Modification. These plans and drawings shall be stamped by an Engineer.		<b>Draft Document for review</b>			
E - 5	All activities shall be conducted in such a way as to minimize impacts on surface drainage and the Licensee shall immediately undertake any corrective measures in the event of any impacts on surface drainage.					
E - 6	The Licensee shall ensure that sediment and erosion control measures are implemented prior to and maintained during activities carried out under this Part to prevent the release of sediment and minimize erosion.					
E - 7	The construction or disturbance of any stream/lake bed or banks of any definable water course are not permitted, unless authorized by the Board in writing.					

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Part F:	<u>Conditions Applying to Operation and Maintenance</u>					
F - 1	The Licensee shall submit to the Board for approval, within ninety (90) days following issuance of the Licence, an Operation and Maintenance (O&M) Manual for the Sewage Disposal Facility and Solid Waste Disposal Facility, prepared where appropriate in accordance with the "Guidelines for the Preparation of an Operation and Maintenance Manual for Sewage and Solid Waste Disposal Facilities in the Northwest Territories; 1996". The Manual shall take into consideration the comments received during the application review process.					
F - 2	The Licensee shall review the O&M Manual referred to in Part F, Items 1 and 2 as required by changes in operation and/or technology and modify accordingly. Revisions are to be submitted in the form of an Addendum to be included with the <u>Annual Report</u> .					
F - 3	An inspection of all engineered facilities related to the management of water and waste shall be carried out annually in July or August by a Geotechnical Engineer. The engineer's report shall be submitted to the Board within sixty (60) days of the inspection, including a covering letter from the Licensee outlining an implementation plan addressing each of the Engineer's recommendations.		Draft Document for review			
F - 4	The Licensee shall perform more frequent inspections of the engineered facilities at the request of an Inspector.					

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F - 5	<p>If, during the period of this Licence, an unauthorized discharge of waste occurs, or if such a discharge is foreseeable, the Licensee shall:</p> <p>a. employ the appropriate contingency measures as approved under the Operation and Maintenance Manual for the Hamlet of NAME</p> <p>b. report the incident immediately via the 24-Hour Spill Reporting Line at (867) 920-8130 and to the Inspector at (867) 975-4295; and</p> <p>c. submit to the Inspector, a detailed report on each occurrence, not later than thirty (30) days after initially reporting the event, that provides the necessary information on the location (including the GPS coordinates), initial response action, remediation/clean-up, status of response (ongoing, complete), proposed disposal options for dealing with contaminated materials and any preventative measures to be implemented.</p>					
Part G:	<u>Conditions Applying to Abandonment and Restoration</u>					
G - 1	<p>The Licensee shall submit to the Board for approval an Abandonment and Restoration Plan, at least six (6) months prior to a) abandoning of any facilities and b) the construction of new facilities to replace existing ones. Where applicable, the Plan shall include information on the following:</p> <p>a. solid waste facility;</p> <p>b. water intake facilities;</p> <p>c. the water treatment and waste disposal sites and facilities;</p> <p>d. petroleum and chemical storage areas;</p> <p>e. any site affected by waste spills;</p> <p>f. leachate prevention;</p> <p>g. an implementation schedule;</p> <p>h. maps delineating all disturbed areas, and site facilities;</p> <p>i. consideration of altered drainage patterns;</p> <p>j. type and source of cover materials;</p> <p>k. future area use;</p> <p>l. hazardous wastes; and</p> <p>m. a proposal identifying measures by which restoration costs will be financed by the Licensee upon abandonment.</p>					

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Part H:	<u>Conditions Applying to the Monitoring Program</u>					
H - 1	The Licensee shall maintain Monitoring Program Stations and implement the program as described in the table below and the conditions under this Part.					
H - 2	The Licensee shall confirm the locations and GPS coordinates for all monitoring stations referred to in Part H Item 1 with an Inspector.					
H - 3	The Licensee shall collect samples at Monitoring Program Stations ABC-2, ABC-3 and ABC-4 according to the frequency provided in Part H Item 1. Samples shall be analyzed for the following parameters: Biochemical Oxygen Demand – BOD <sub>5</sub> Faecal Coliforms Total Suspended Solids pH Conductivity Nitrate-Nitrite Oil and Grease (visual) Total Phenols Magnesium Calcium Sodium Potassium Chloride Sulphate Total Hardness Total Alkalinity Ammonia Nitrogen Total Zinc Total Cadmium Total Iron Total Cobalt Total Manganese Total Chromium Total Nickel Total Copper Total Lead Total Aluminum Total Arsenic Total Mercury Total Organic Carbon (TOC) Total Petroleum Hydrocarbons (ABC-3 only)					
H - 4	The Licensee shall measure and record in cubic meters, the monthly and annual quantities of water pumped from Monitoring Program Station FIC-1 for all purposes and effluent pumped or discharged from Monitoring Program Stations FIC-3 and FIC-4.					
H - 5	The Licensee shall sample and analyse sludge in accordance with the approved Operations and Maintenance Manual referred to in Part F Item 2.					

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H - 6	The Licensee shall measure and record the annual quantities of sludge removed from the Sewage Disposal Facility along with the methods of treatment, storage, and disposal provided.					
H - 7	Additional monitoring stations, sampling and analysis may be requested by an Inspector.					
H - 8	All sampling, sample preservation and analyses shall be conducted in accordance with methods prescribed in the current edition of Standard Methods for the Examination of Water and Wastewater, or as approved by the Board in writing.					
H - 9	All analyses shall be performed by a laboratory certified by the Canadian Association of Environmental Analytical Laboratories (CAEAL), or as otherwise approved by an Analyst.					
H - 10	The Licensee shall include all of the data and information required by the Monitoring Program as well as an indication of wastewater treatment levels upstream and downstream of the Wetland Area in the Licensee's Annual Report, as required per Part B, Item 1, or as requested by an Inspector.		<b>Draft Document for review</b>			
H - 11	The Licensee shall, within sixty (60) days of Licence issuance, submit to the Analyst for approval, a Quality Assurance/ Quality Control (QA/QC) Plan, which addresses both field and laboratory requirements. The Plan shall be submitted to the Board upon approval by the Analyst for inclusion with the O&M Manual, required under Part F, Item 2(f).					
H - 12	Modifications to the Monitoring Program may be made only upon written approval from the NWB.					