



September 19, 2014

Your file - Votre référence
3BM-REP0409

Our file - Notre référence
IQALUIT-# 853166

Megan Porter
Licence Administrator Assistant
Nunavut Water Board
GJOA HAVEN, NU X0E 1J0

Re: Aboriginal Affairs and Northern Development Canada Review of the Hamlet of Repulse Bay's Application to Renew Water Licence #3BM-REP0409

Dear Ms Porter :

Thank you for your email of August 20, 2014, concerning the above mentioned application. A memorandum is provided for the Board's consideration. Comments and recommendations have been provided pursuant to Aboriginal Affairs and Northern Development Canada's mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

For further information please contact me via email at kristi.maxwell@aandc-aadnc.gc.ca or by telephone at 867-975-4567.

Sincerely,

Kristi Maxwell
Water Management Coordinator
Water Resources Division
Resource Management Directorate
Aboriginal Affairs and Northern Development Canada
IQALUIT, NU X0A 0H0

Encl.

c.c.: Murray Ball, Manager of Water Resources, AANDC Nunavut
Erik Allain, Manager of Field Operations, AANDC Nunavut

Memorandum

To: Phyllis Beaulieu, Nunavut Water Board

From: Kristi Maxwell, Aboriginal Affairs and Northern Development Canada

CC: Robin Ikkutisluk (NWB), Megan Porter (NWB), Murray Ball (AANDC), Erik Allain (AANDC)

Date: September 19, 2014

Re: Water Licence Renewal Application, #3BM-REP0409

Licensee: Hamlet of Repulse Bay
Project: Municipal water licence
Region: Kivalliq

Comments:

A. Background

On August 20, 2014, the Nunavut Water Board (NWB) provided notification of the Hamlet of Repulse Bay's (the "Licensee") application to renew Water Licence #3BM-REP0409 to allow for the use of water and deposit of waste for municipal undertakings. Mr. Shah Alam, Municipal Planning Engineer, Community Government Services, Government of Nunavut has submitted this application on behalf of the Hamlet of Repulse Bay.

Interested parties were asked to review this application and provide comments by September 20, 2014.

B. Results of review

On behalf of Aboriginal Affairs and Northern Development Canada (AANDC), the following comments and recommendations are provided:

Item	Reference	Issue	Comment	Recommendation
1.	140325-3BM-REP0409 Facility Assessment and Design Brief Jan 10 13-Final-ILAE	Potential for fuel leakage at water truck fill station.	The Pump house fuel tanks are filled from outside via fuel lines that pass through the interior spill containment basin. At least one gasket along this line is missing, allowing for a potential spill should the main tank leak.	Operation and Maintenance Plan should include routine inspection and maintenance of the fuel line and spill containment basin. Any refueling operation should include secondary containment and /or drip pans/trays.
2.	140325-3BM-REP0409 Facility Assessment and Design Brief Jan 10 13-Final-ILAE	Relocation of access road – new road will cross an existing waterway.	Minor relocation of access road will be required due to increased size of planned water truck fill station. Any road construction runs the risk of blocking or re-routing existing waterways.	Appropriate measures must be taken to ensure proper re-routing and management of existing waterways prior to construction of the new access road.
3.	140214-3BM-REP0409 1310 Design Brief-ILAE	Slope stability and potential leakage of planned sewage lagoon berms.	Geotechnical investigation indicated the potential for thaw settlement of lagoon berms and therefore the risk of tear of any synthetic liners installed.	Measures must be taken to ensure risk of tear of liner and leak of berms is minimal prior to initiating construction of new sewage lagoon. Operation and Maintenance Plan should include a geotechnical inspection annually and appropriate maintenance of lagoon berms. Results should be noted in the annual report.
4.	140214-3BM-REP0409 1310 Design Brief-ILAE	Sewage sludge management.	Only preliminary suggestions for the management of sludge from the sewage lagoon exist.	The licensee should develop a sludge management plan prior to removal of sludge from sewage lagoon. The development of this plan once submitted, reviewed and approved by the water board will ensure that the sewage lagoon effectiveness will not decrease in the absence of a plan and the increased loading of sludge on the sewage

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				treatment process.
5.	Annual Reports	Monitoring results from the Monitoring program as stipulated in Part H, of the water licence, are to be reported to the Nunavut Water Board as per Part B Item 1 of of Water Licence 3BM-REP0409.	AANDC could find no monitoring results pertaining to the yearly monitoring program.	The proponent has not complied with water licence requirements to report water quality monitoring results to the Nunavut Water Board.
6.	140214-3BM-REP0409 1310 Design Brief-ILAE	Wetland area	There seems to be no defined border for the wetland area.	If using the 'wetland' area between the sewage lagoon and the ocean as part of the treatment process, then the licensee should define the borders of their wetland area that is to be part of the sewage treatment facility. The defined borders will make it easier to assess the effectiveness of the use of the "wetland", by, for example, monitoring effluent quality downstream of the treatment area.
7.	140325 – 3BM-REP0409 Solid Waste Management Facility	Confirmation that leachate is no longer escaping from the solid waste landfill facility	The document makes reference to the fact that leachate use to escape to the environment from the landfill facility, then an earthen berm was constructed to stop the leachate.	The licensee should provide evidence that the earthen berm is being effective in its purpose. This evidence should be provided to the board in the form of a study and report within two years of the approval of a new water licence.
8.	Water licence application	Operation & Maintenance (O&M) plans	The licensee has indicated that new operation and maintenance plans will be developed for the new facilities.	These plans should be submitted to the Nunavut Water for review and approval at least six months before the operation of any new facility.

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9.	Water Licence application	Abandonment & Reclamation/Remediation (A&R) plan for old sewage lagoon	There was no A&R plan with the water licence application for the old sewage lagoon.	The licensee is required to provide an A&R plan to reclaim all facilities under a water licence that are no longer being used, and this would include the old sewage lagoon. The lagoon reclamation plan should be submitted to the Nunavut Water for review and approval at least six months before any reclamation/remediation takes place.
10.	Water licence application	Landfarm Facility	There is no documentation on this facility.	The licensee should provide an O&M plan regarding the landfarm facility within six months of the approval of a new water licence.
11.	Water licence application	Term of licence	Section 25 of the water licence renewal application indicating length of term of water licence renewal was not filled out.	A five year licence renewal is recommended.

Prepared by Kristi Maxwell and Ian Parsons