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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

File No.: **3BM-REP1520**

July 12, 2018

Rob Hedley
Senior Administrative Officer
Hamlet of Repulse Bay
P.O. Box 10
Repulse Bay, NU X0C 0H0

Sarah Collins
Municipal Planning Engineer
Community and Government Services
Kivalliq Region, Government of Nunavut
P.O. Box 490
Rankin Inlet, NU, X0C 0G0

Email: saonaujaat@qiniq.com

Email: scollins@gov.nu.ca

RE: NWB Technical Review of 2017 Annual Report for the Hamlet of Naujaat (Repulse Bay); Water Licence No. 3BM-REP1520

Dear Mr. Hedley and Ms. Collins:

The Nunavut Water Board (NWB) has completed a technical review of the 2017 Annual Report.

On April 17, 2018, the NWB acknowledged receipt of the Annual Report and provided it to the Kivalliq distribution list for information. No comments have been received to date.

The technical review of the Annual Report found that additional information is necessary to meet the following requirements of the Licence:

- Part H, Item 1:

The Licensee shall maintain Monitoring Program Stations at the following locations: REP-1, REP-2, REP-2a, REP-3, REP-3a, REP-4, REP-4a, REP-5, and REP-6.

The Annual Report did not provide data for Monitoring Program Stations REP-2a, REP-4, and REP-4a. No explanation was given for why this data was not provided.

- Part H, Item 2:

The Licensee shall measure and record in cubic metres, the daily, monthly and annual quantities of Water extracted for all purposes at Monitoring Program Station REP-1.

The Annual Report did not provide daily quantities for REP-1. Monthly and annual quantities from the On Tap Water Delivery System were provided. The Report indicated

that the volumes were in cubic metres, but it is very likely that the volumes provided are in litres given the magnitude of the values.

- Part H, Item 3:

The Licensee shall measure and record in cubic metres, the daily, monthly and annual quantities of raw sewage offloaded from trucks at Monitoring Program Station REP-3 and REP-3a.

The Annual Report did not provide daily quantities for REP-3 or REP-3a. Monthly and annual estimates of sewage quantity, based on the On Tap Water Delivery System, was provided however, as per the discussion above, it's likely the values reported are Litres.

- Part B, Item 1d states that the annual report shall contain:

the daily, monthly and annual quantities in cubic metres of sewage Waste discharged; and the monthly and yearly quantities of every type of Waste—re: landfill, bulky metal, hazardous, wood and soil—accepted at the Solid Waste Facilities; the total volume of sludge removed from the sewage lagoon and the disposal method

The Annual Report did not provide any information on the quantities of solid waste accepted at the Solid Waste Facilities.

- Part H, Item 7:

The Licensee shall sample at Monitoring Program Station REP-6, a minimum of three (3) times annually, once within two weeks of commencing discharge at Monitoring Station REP-4 or REP-4a, once half-way through discharge and once within two weeks following the end of discharge.

The Annual Report did not provide three sets of analytical data for REP-6. Analytical data for two sampling events at REP-6 (June 29, 2017 and July 19, 2017) was provided. No explanation was provided for why only two samples were collected at REP-6.

Please provide this information in the 2018 Annual Report and all future reports. If for some reason data or information is not available, include a discussion indicating:

- What information is missing;
- Why it was not provided; and
- Steps being made to provide it in the future.

The NWB notes that the Licensee has not provided all the submissions previously required by the Licence:

- Part F, Item 1:

The Licensee shall submit to the Board for approval in writing, an **Operation and**

Maintenance Plan for the Upgraded Sewage Disposal Facility, as described in Part D, Item 1, at least ninety (90) days prior to the commissioning of the Upgraded Sewage Disposal Facility. The Plan shall include a Sludge Management section containing operating procedures, de-sludging schedule, sludge volume, monitoring methodology and treatment/disposal options for excavated sludge.

To date, the NWB has no record of receiving this information. The Board notes that in the 2015 Annual Report, the Hamlet stated that Sewage Lagoon construction was cancelled. No report was submitted in 2016. The 2017 Annual Report does not mention the Sewage Lagoon construction. The Hamlet might choose to amend the licence to remove this and other clauses that are tied to the Sewage Lagoon if it is not going to be built.

- Part F, Item 2:

The Licensee shall submit to the Board for approval in writing, an **Operation and Maintenance Plan for Solid Waste Disposal Facility**, within six (6) months of the issuance of this Licence. The Plan shall include a plan for the management of Hazardous Wastes.

To date, the NWB has no record of receiving this information which was due on October 8, 2015.

- Part F, Item 3:

The Licensee shall submit to the Board for review, within six (6) months of the issuance of this Licence, a Long-term **Solid Waste Management Plan for the Hamlet of Repulse Bay** that provides definitive objectives for building new or upgrading existing solid Waste management infrastructure.

To date, the NWB has no record of receiving this information which was due on October 8, 2015.

- Part F, Item 5:

The Licensee shall submit to the Board for approval in writing, within ninety (90) days of issuance of the Licence, a stand-alone **Spill Contingency Plan** that addresses all Water, Sewage and Solid Waste Operations including management of Hazardous materials, in the event of a spill. The stand-alone Plan is to take into consideration the appropriate sections provided in *Guidelines for Spill Contingency Planning* (AANDC, 2007).

To date, the NWB has no record of receiving this information which was due on July 8, 2015.

- Part F, Item 6:

The Licensee shall submit to the Board for approval in writing, at least ninety (90) days prior to the commissioning of the Upgraded Water Supply Facility, as described in Part C, Item 1, an **Operations and Maintenance Plan for the Upgraded Water Supply Facility**.

To date, the NWB has no record of receiving this information. The Hamlet states in the 2017 Annual Report “The updated O&M Manual for the new Water Treatment Plant will be submitted following project completion”. The Board notes that this plan does not meet the intent of the Licence to have the operating plan ready and approved prior to commissioning.

- Part G, Item 6:

The Licensee shall submit for review, within six (6) months of Licence issuance, a **Closure and Remediation Report for the site of the solid Waste facility used prior to 2002**. This report is to be stamped by an Engineer and describe the history of the site and its decommissioning, and also the Engineer’s assessment of whether further reclamation is required at the site to mitigate the possibility of contamination to surrounding freshwater systems.

To date, the NWB has no record of receiving this information which was due on October 8, 2015.

- Part H, Item 12:

The Licensee shall submit to the Board for review, within ninety (90) days of the issuance of the Licence, a **Quality Assurance/Quality Control Plan** based on the guidance document *Quality Assurance (QA) and Quality Control (QC) Guidelines For Use by Class “B” Licensees in Collecting Representative Water Samples in the Field and for Submission of a QAQC Plan* INAC (1996). The Plan shall include a cover letter from an accredited laboratory confirming acceptance of the monitoring Plan and analyses to be performed under the Licence.

To date, the NWB has no record of receiving this information which was due on July 8, 2015.

The NWB strongly recommends that the Licensee address issues identified in 2017 by the Inspector¹. Please provide a brief summary of work done to address concerns or deficiencies listed in the inspection reports and/or compliance reports prepared by an Inspector or other parties in the 2018 Annual Report.

¹ Indigenous and Northern Affairs Canada (INAC) Inspection Report, July 18, 2017.

Should you have any questions, please feel free to contact us at (867) 360-6338, at your earliest convenience.

Sincerely,

Richard Dwyer
Nunavut Water Board,
Manager of Licencing

Cc: Distribution List – Kivalliq