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Department of Environment

Ministère de l'Environnement

August 21, 2009

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board

via Email to: licensing@nunavutwaterboard.org

**RE: NWB FILE # 3BM-PON0409 — WATER LICENSE RENEWAL
APPLICATION — HAMLET OF POND INLET**

Dear Ms. Beaulieu:

The Government of Nunavut, Department of Environment (DOE) has reviewed the water license renewal application from the Hamlet of Pond Inlet.

The DOE cannot support a renewal of the Hamlet of Pond Inlet's water license until the applicant is in compliance with the existing license. Pursuant to the July 2009 Inspector's report, the Hamlet of Pond Inlet has failed to address the following issues:

- Seepages from the sewage lagoon
- Waste oils leaching off site
- Improper storage of barrels
- Segregation of bulk metals
- Segregation of hazardous wastes

Based on DOE's mandate under the *Environmental Protection Act*, we have the following comments and recommendations to make.

WASTE OIL CELL

- In 2001, a letter from FSC Engineers and Architects stated that the waste oil cell would be decommissioned in September of that same year, however, an abandonment and restoration plan for this site has not been located.
- Efforts should be made to transport any contaminated soils from this area to the landfarm for remediation.

LANDFARM

- The Operations and Maintenance manual for this facility states that soil testing will be carried out annually, however, it fails to outline the standards that the applicant intends to achieve for soil remediation. It is important the soil is treated to an approved standard before the soil can be disposed of.
- In 2007, DOE requested that locations of monitoring wells, as well as monitoring frequencies be provided, however, the proponent has still not supplied this information. As well, the frequency of collection sump monitoring should be provided.
- A preliminary abandonment and restoration plan for this facility should be submitted for review.
- The O&M manual for this facility outlines proper storage procedures for the Superphosphate and Ammonium Nitrate, however, it does not outline how or where these chemicals will, in fact, be stored. Actual storage plans should be clarified.

SPILL CONTINGENCY PLANNING

- The NWT-Nunavut spill report form has been updated, and can be obtained from DOE website (<http://www.gov.nu.ca/env/applications.shtml>). This form should be included in the spill plan, and the proponent is required to use this form for reporting to the Spill Line in the case of spills. Additionally, the proponent is advised to enter spill information electronically in the form in the case of spills so the information is legible to regulators inspecting the spill.
- It is recommended that a spill contingency plan be provided for all facilities related to this water license. The applicant is referred to DOE's *Spill Contingency Planning and Reporting Regulations* and *Spill Reporting in Nunavut: a Guide to the New Regulations*.

DISPOSAL OF MUNICIPAL SOLID WASTE

- For the disposal of combustible wastes, it is recommended that they be segregated and burned in a controlled manner and at a controlled site which is separate from the working landfill so that the fire cannot spread.
- Standard burning conditions shall apply, such as burning on days where winds are light and blowing away from the community.

- Materials must be burned in manageable volumes so that fires do not get out of control.
- Applicable permits must be obtained prior to burning.

SEWAGE LAGOON

- A preliminary abandonment & restoration plan related to the decommissioning of the existing sewage lagoon should be submitted for review.
- The July 2009 Inspector's report states that there are seepages from the sewage lagoon at both the North and South walls. This issue should be addressed and actions taken to prevent any further seepage.

HAZARDOUS WASTES

- Hazardous wastes should be properly segregated and a liner should be installed to obstruct any possible spills and prevent contamination of surrounding areas.

OTHER

- The applicant has stated that the following will be submitted upon availability of funding. A tentative timeline for these submissions should be prepared.
 - O&M Manual for solid waste disposal
 - Monitoring program
 - A&R plan for solid waste disposal

DOE thanks the NWB for giving us the opportunity to review and provide comments on the Hamlet of Pond Inlet's water license renewal application. Please contact us if you have any questions or comments.

Yours sincerely,

Original signed by

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