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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

File No.: **3BM-QIK1419**

June 11, 2018

Geela S. Kooneliusie
Senior Administrative Officer
Hamlet of Qikiqtarjuaq
P.O. Box 4
Qikiqtarjuaq, NU X0A 0B0

Email: munqik@qiniq.com

**RE: NWB Technical Review of 2017 Annual Report for the Hamlet of Qikiqtarjuaq;
Water Licence No. 3BM-QIK1419**

Dear Ms. Kooneliusie:

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

On March 12, 2018, the NWB acknowledged receipt of the Annual Report and provided it to the Qikiqtani 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:
QIK-1, QIK-2, QIK-3, QIK-6, QIK-8, QIK-12, QIK-13, QIK-14, QIK-15, QIK-16,
QIK-17, and QIK-18.

The Annual Report did not provide data for most of these Monitoring Program Stations. No explanation was provided 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 pumped at Monitoring Program Station QIK-2 and when use is directly from Station QIK-1, for all purposes.

The Annual Report did not provide any data for QIK-1. This information is very

important because it is the compliance point for the Licence volume limits under Part C, Item 2.

The Annual Report did not provide daily quantities or quantities in cubic metres for QIK-2. Monthly and annual quantities from the On Tap Water Delivery System was provided in Litres. The Report did not explicitly state that this information was for QIK-2.

- 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 QIK-3 for all purposes.

The Annual Report did not provide daily quantities or quantities in cubic metres for QIK-3. Monthly and annual quantity estimates of sewage based on the On Tap Water Delivery System was provided in Litres, however the Report did not explicitly state that this information was for QIK-3.

- Part H, Item 4:

The Licensee shall sample at Monitoring Program Stations QIK-6 and QIK-12 once at the beginning, middle and near the end of discharge.

The Annual Report did not provide three sets of analytical data for QIK-6 and QIK-12. Analytical data for one sampling event at QIK-6 and at a site labelled “Seeping Waste Water” was provided. No explanation was provided for the rationale or location of the “Seeping Waste Water” sample. No explanation was provided for why only one sample was collected at QIK-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 approval within ninety (90) days of issuance of the Licence a revised “**Operation and Maintenance (O&M) Plan for Water Reservoir, Sewage Lagoon and Solid Waste Disposal Facility**” 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 revised Plan is to take into consideration at a minimum, the comments received during

the review of the Plan in March, 2011, during the Application review process and any necessary changes to be consistent with this Licence.

To date, the NWB has no record of receiving this information which was due on November 5, 2014.

- Part F, Item 2:

The Licensee shall submit to the Board for approval within ninety (90) days of issuance of the Licence, a stand-alone **Environmental Emergency Contingency Plan for Water, Sewage and Solid Waste Operations**, taking into consideration at a minimum, the comments received during the review of the Plan in March, 2011, during the Application review process and any necessary changes to be consistent with this Licence.

To date, the NWB has no record of receiving this information which was due on November 5, 2014.

- Part F, Item 3:

The Licensee shall submit to the Board for approval at least sixty (60) days prior to commissioning the Landfarm, an “**Operation and Maintenance (O&M) Plan for the Hamlet of Qikiqtarjuaq Landfarm Facility**”, taking into consideration at a minimum, the comments received during the Application review process and any necessary changes to be consistent with this Licence. The Plan is to be provided as an *addendum* to the “Solid Waste Facility Operation and Maintenance (O&M) Plan”

To date, the NWB has no record of receiving this information.

- Part H, Item 13:

The Licensee shall submit to the Board for review, within 2014 Annual Report, a **Quality Assurance/Quality Control Plan** that conforms to 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 QA/QC Plan INAC (1996). The Plan shall be acceptable to an accredited laboratory and include a covering letter from the accredited laboratory confirming acceptance of the Plan for analyses to be performed under the Licence.

To date, the NWB has no record of receiving this information which was due on March 31, 2015.

The NWB strongly recommends that the Licensee address issues identified in 2017 by the Inspector¹. The NWB would like to better understand what in-river work is being done and what permitting has been completed for it. Please provide a brief summary of work done to address

¹ Indigenous and Northern Affairs Canada (INAC) Inspection Report, October 3, 2017.

concerns or deficiencies listed in the inspection reports and/or compliance reports prepared by an Inspector or other parties in the 2018 Annual Report.

The NWB notes that Licence 3BM-1319 will expire in 2019. Review of a renewal application for a Type “B” Licence typically takes 90 days. Please ensure you provide a renewal application to the NWB at least 90 days prior to expiry. The NWB is willing to provide some guidance on how to put together a high quality application.

Should you have any questions, please feel free to contact me, Dave Baines, at (867) 360-6338 (extension 29), at your earliest convenience.

Sincerely,

Dave Baines
Nunavut Water Board,
Technical Advisor

Cc: Distribution List – Qikiqtani