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Nunalingni Kavamatkunnilu Pivikhaqautikkut
Department of Community and Government Services
Ministère des Services communautaires et gouvernementaux

Plan for Compliance

HAMLET OF RANKIN INLET - PLAN FOR COMPLIANCE
NWB LICENCE NO. 3BM-RAN1214
05/03/2015

Licence Condition		Status of Compliance	Short Term Plan for Compliance	Responsibility	Schedule of Implementation	Long Term Plan for Compliance
PART B	GENERAL CONDITIONS					
B-1	The Licensee shall file an Annual Report no later than March 31st of the year following the calendar year reported.	<i>Failure to submit required Annual Reports (AANDC Inspection August 19, 2014).</i>	Submit 2013 Annual Report to NWB and AANDC. Submit 2014 Annual Report on time.	Hamlet of Rankin Inlet with assistance from CGS	2013 Annual Report was submitted to NWB and AANDC on October 23, 2014. 2014 Annual Report will be submitted to the NWB by March 13, 2015.	Ensure completed Annual Reports are submitted by March 31st of the following year.
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.	<i>Failure to comply with the Monitoring Program (AANDC Multi-year Compliance Summary February 22, 2012).</i>	Weekly Checks of the Monitoring Stations will begin in May and continue to the end of August. When flow is present, monthly samples will be taken. May to August checks and a summary of sample analysis will be submitted with the Annual Report.	Hamlet of Rankin Inlet	Weekly checks of the Monitoring Stations will begin May 2015 and continue until the end of August 2015. Samples will be taken monthly when flow is present. Results of the sampling program will be included with the 2015 Annual Report.	Weekly Checks of the Monitoring Stations will begin in May and continue to the end of August. When flow is present, monthly samples will be taken. May to August checks and a summary of sample analysis will be submitted with the Annual Report.
B-5	The Licensee shall maintain the necessary signs to appropriately identify the stations of the Monitoring Program. Signs are to be posted at locations following confirmation by the Inspector and be in the Official Languages of Nunavut.	<i>Failure to maintain signage which identifies sampling locations (AANDC Inspection August 19, 2014).</i>	Signage will be ordered during the winter season and installed at the monitoring stations prior to August 31, 2015.	Hamlet of Rankin Inlet with assistance from CGS	Pictures of the signage will be provided to the Inspector by August 31, 2015.	Monitoring station signage will be inspected annually, and maintenance or replacement will be done as necessary. Pictures of the signage can be provided upon request.
B-10	The Licensee shall submit to the Board for approval, within thirty (30) days of Licence issuance, a Plan for Compliance that clearly demonstrates the measure the Licensee will undertake, including an implementation schedule, to achieve full compliance with the conditions of this Licence, including the issues raised in the Inspector's Reports.	<i>Failure to submit a compliance plan in 30 days of licence issuance (AANDC Inspection August 19, 2014).</i>	Complete Compliance Plan for Water Licence No. 3BM-RAN1214.	Hamlet of Rankin Inlet with assistance from CGS	Compliance Plan submitted with the Amendment/Renewal Application March 5, 2015.	Target dates set in Compliance Plan will be met to work towards full compliance under the Licence. The Compliance Plan will be updated with the status of outstanding conditions and submitted with the Annual Report or as requested by the NWB.
B-12	The licensee shall, for all Plans submitted under this Licence, implement the Plan as approved by the Board in writing.	<i>Failure to fully implement all Plans associated with this licence (AANDC Inspection August 19, 2014).</i>	Plans previously submitted to the NWB will be reviewed and implemented as outlined.	Hamlet of Rankin Inlet	Ongoing	Future plans will be implemented as approved by the NWB.

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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 conditions imposed upon approval of a Plan by the Board become part of this Licence. All terms and conditions of the Licence shall be contemplated in the development of a Plan where appropriate.	<i>Failure to carry out the Plans pursuant to the terms and conditions of this licence (AANDC Inspection August 19, 2014).</i>	Plans previously submitted to the NWB will be reviewed and implemented as outlined.	Hamlet of Rankin Inlet	Ongoing	Future plans will be implemented as approved by the NWB.
B-14	The Licensee shall review the Plans referred to in this Licence as required by changes in operation and/or technology and modify the Plans or Manuals accordingly. Revisions to the Plans or Manuals are to be submitted in the form of an addendum to be included with the Annual Report required by Part B, Item 1 (j), complete with a revisions list detailing where significant content changes are made.	<i>Failure to review Plans and modify them accordingly. This referred specifically to the Plans regarding the use of the new Landfill (AANDC Inspection August 19, 2014).</i>	Plans previously submitted to the NWB will be reviewed and modified. Reference to the O&M of the new Solid Waste Site, where there are no plans to commission in the near future, will be removed.	Hamlet of Rankin Inlet with assistance from CGS	The updated and modified plans will be submitted to the NWB by August 31, 2015.	The Plans referred to in this Licence will be reviewed annually and any modifications will be documented in the Annual Report.
PART D	CONDITIONS APPLYING TO WASTE DISPOSAL					
D-2	The Licensee shall dispose of and permanently contain all solid wastes at the Waste Disposal Facilities or as otherwise approved by the Board in writing.	<i>Failure to prevent waste from entering water as require (AANDC Multi-year Compliance Summary February 22, 2012).</i>	Fencing will be maintained at the Solid Waste Site. All municipal solid waste will be contained within the Solid Waste Site.	Hamlet of Rankin Inlet	A gate and fence was installed September 2014 at the entrance to the Solid Waste Site to limit access to the site and contain the solid waste currently at the site.	Maintenance to the fencing will occur as needed. Annual clean-up of the Solid Waste Site will be conducted by the Hamlet.
D-3	The Licensee shall not open burn plastics, wood treated with preservatives, electric wire, styrofoam, asbestos or painted wood to prevent the deposition of Waste materials of incomplete combustion and/or leachate from contaminated ash residual, from impacting any surrounding waters, unless otherwise approved by the Board in writing.	<i>Failure to Operate the Solid Waste Disposal facilities to the satisfaction of the Inspector (AANDC Multi-year Compliance Summary February 22, 2012).</i>	Plastics, treated wood, electric wire, styrofoam, asbestos or painted wood will not be open burnt. Recommendations in the <i>Solid Waste Management Facility O&M Plan</i> will be followed.	Hamlet of Rankin Inlet	Plastics, treated wood, electric wire, styrofoam, asbestos or painted wood will not be open burnt on an on-going basis.	Continue following recommendations in the <i>Solid Waste Management Facility O&M Plan</i> .
D-4	The Licensee shall segregate and store all hazardous materials and hazardous waste, including waste oil, within the Waste Disposal Facilities in a manner to prevent the deposit of deleterious substances into any water, until such a time that the materials have been removed for proper disposal at licensed facility.	<i>Failure to segregate and store all hazardous waste in a manner to prevent the deposit of deleterious substances to any water (AANDC Inspection August 19, 2014).</i>	Hazardous waste will be segregated from household waste and properly stored.	Hamlet of Rankin Inlet	Batteries from the Solid Waste Site will be moved and stored in battery boxes.	Ongoing segregation and proper storage of hazardous waste will occur.

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D-6	The Licensee shall treat all Petroleum Hydrocarbon Impacted Soil in the Landfarm Facility to the Treatment Objective, or as otherwise approved by the Board.	<i>Failure to treat all contaminated soils in the Landfarm (AANDC Inspection August 19, 2014).</i>	Follow recommendations in Section 3.7 of the <i>Solid Waste Management Facility O&M Plan</i> for operation procedures of the landfarm.	Hamlet of Rankin Inlet with assistance from CGS	Follow recommendations in Section 3.7 of the <i>Solid Waste Management Facility O&M Plan</i> to ensure proper operation of the landfarm. Sampling will be taken of the soil currently within the landfarm summer 2015 to determine if the soil meets CCME guidelines and can be removed from the facility. If soil meets guidelines, approval will be sought for an Abandonment and Restoration Plan for the landfarm.	The Licensee wishes to decommission the landfarm and remove the landfarm as part of the municipal Licence. The Abandonment and Restoration Plan will be submitted to the NWB a minimum of six (6) months prior to abandoning the facility.
PART F	CONDITIONS APPLYING TO OPERATION AND MAINTENANCE					
F-1	The Licensee shall submit to the Board for approval, at least sixty (60) days prior to commissioning the New Landfill, a Status Update Report and photographic record, which demonstrates implementation of the pre-commissioning recommendations outlined in the <i>Solid Waste Management Facility Operation and Maintenance (O&M) Plan, Hamlet of Rankin Inlet</i> , dated December, 2008.	<i>Failure to submit revisions to O and M (AANDC Inspection August 19, 2014).</i>	Requesting condition to be removed from new Licence. There is no plan to commission the new Solid Waste Site in the near future.	Hamlet of Rankin Inlet with assistance from CGS	Requesting condition to be removed from new Licence.	If, in the future, the new Solid Waste Site or another site is to be commissioned, the NWB will be notified and an Amendment Application will be submitted for approval.
F-4	An inspection of all engineered facilities related to the management of Waste shall be carried out annually in July or August by a Geotechnical Engineer. The engineer's report shall be submitted to the Board for review, within sixty (60) days of the inspection, including a covering letter from the Licensee outlining an implementation plan addressing the Geotechnical Engineer's recommendations.	<i>Failure to carry out geotechnical inspection on waste management facilities (AANDC Inspection August 19, 2014).</i>	No annual inspections were conducted by a Geotechnical Engineer from 2012-2014 therefore no reports can be provided to the NWB.	CGS Rankin Inlet Municipal Engineer	Annual inspection of the Waste management facilities will be completed by the CGS Municipal Engineer and a record will be kept on the Annual Report Card. Annual inspection 2015 will take place in July or August.	Annual inspection of the Waste management facilities will be completed by the CGS Municipal Engineer. If any issues are found with the berm, appropriate measures will be taken for further study or repair of the berms. The annual berm inspection and any follow-up measure taken will be reported in the Annual Report.
PART G	CONDITIONS APPLYING TO THE MONITORING PROGRAM					
G-1	The Licensee shall, within six (6) months of Licence issuance, revise and resubmit to the Board for approval in writing, the <i>Hamlet of Rankin Inlet, Rankin Inlet Solid Waste Site Abandonment and Restoration (A&R) Plan</i> , dated July 2009, for the Old Landfill.	<i>Requesting condition to be removed from new Licence.</i>	Requesting condition to be removed from new Licence. There is no plan to abandon the existing Solid Waste Site in the near future.	Hamlet of Rankin Inlet with assistance from CGS	Requesting condition to be removed from new Licence.	If, in the future, the existing Solid Waste Site is to be abandoned, the NWB will be notified and an Abandonment and Restoration Plan will be submitted for approval.

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PART H	CONDITIONS APPLYING TO THE MONITORING PROGRAM					
H-1	The Licensee shall maintain Monitoring Program Stations at the following locations: RAN-1 - Unassigned - Inactive RAN-2 - Runoff from the Old Landfill - Active RAN-3 - Runoff from the New Landfill - Active Upon Commissioning RAN-5 - Monitoring well located up gradient of the Landfarm - Active RAN-6 - Monitoring well located down gradient of the Landfarm - Active	<i>Failure to maintain monitoring program stations (AANDC Inspection August 19, 2014).</i>	Required sampling will occur at the Monitoring Program Stations described.	Hamlet of Rankin Inlet	Sampling results will be included in the Annual Reports to be submit prior to the March 31st deadline each year.	Sampling will take place annually and results will be included in the Annual Reports to be submit prior to the March 31st deadline each year.
H-4	The Licensee shall measure and record the origin and volume of all soil, from all locations entering the Landfarm Facility.	<i>Failure to measure and record the amount of material entering the Landfarm (AANDC Inspection August 19, 2014).</i>	Volumes of all soil entering the Landfarm will be recorded.	Hamlet of Rankin Inlet	Monitoring results will be included in the Annual Reports to be submit prior to the March 31st deadline each year.	Monitoring results will be included in the Annual Reports to be submit prior to the March 31st deadline each year.
H-5	The Licensee shall characterize through laboratory analysis and record the concentrations of petroleum hydrocarbons in Petroleum Hydrocarbon Impacted Soil entering the Landfarm Facility from all sources, as per the CCME <i>Canada-Wide Standard for Petroleum Hydrocarbons (PHC) in Soil</i> .	<i>Failure to characterize soils that enter the Landfarm (AANDC Inspection August 19, 2014).</i>	Petroleum hydrocarbon contamination of all soil entering the Landfarm will be assessed.	Hamlet of Rankin Inlet	Monitoring results will be included in the Annual Reports to be submit prior to the March 31st deadline each year.	Monitoring results will be included in the Annual Reports to be submit prior to the March 31st deadline each year.
H-9	The Licensee shall install groundwater monitoring wells at the Landfarm Facility. These wells shall be located with at least one located upstream of the facility for background data collection (RAN-5) and at least one downstream of the facility (RAN-6).	<i>Requesting condition to be removed from new Licence.</i>	Requesting condition to be removed from new Licence.	Hamlet of Rankin Inlet with assistance from CGS	Requesting condition to be removed from new Licence. Sampling will be taken of the soil currently within the landfarm summer 2015 to determine if the soil meets CCME guidelines and can be removed from the facility. If soil meets guidelines, approval will be sought for an Abandonment and Restoration Plan for the landfarm.	The Licensee wishes to decommission the landfarm and remove the landfarm as part of the municipal Licence. The Abandonment and Restoration Plan will be submitted to the NWB a minimum of six (6) months prior to abandoning the facility.
H-13	All analyses shall be performed in a laboratory accredited according to ISO/IEC Standard 17025 for all required analyses. The accreditation shall be current and in good standing.	<i>Failure to maintain Lab accreditation records (AANDC Inspection August 19, 2014).</i>	The updated QA/QC Plan will include laboratory accreditation for the required analyses.	Hamlet of Rankin Inlet	The updated QA/QC Plan with laboratory accreditation documentation will be submitted by April 30, 2015.	The QA/QC will be reviewed annually laboratory accreditation will updated when needed. The NWB will be notified of any changes/updates in the Annual Report.

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H-14	The Licensee shall submit to the Board upon approval by an Analyst, a Quality Assurance/Quality Control (QA/QC) Plan. The Plan shall include up to date sampling methods to all applicable standards, acceptable to an accredited laboratory as required by Part H, Item 12 and Part H, Item 13. The Plan shall include a covering letter from the accredited laboratory and Analyst, confirming acceptance of the Plan for analyses to be performed under this Licence.	<i>Failure to submit a QA/QC Plan (AANDC Inspection August 19, 2014).</i>	The <i>Environmental Monitoring Program and Quality Assurance/Quality Control Plan</i> was prepared by Nuna Burnside, December 2008. The QA/QC Plan will be reviewed and updated prior to the 2015 sampling season for submission to the NWB.	Hamlet of Rankin Inlet with assistance from CGS	The updated QA/QC Plan, with cover letter from an accredited lab confirming acceptance, will be submitted to the NWB by April 30, 2015.	The QA/QC will be reviewed annually and the NWB will be notified of any changes/updates in the Annual Report.
H-16	The Licensee shall include all of the data and information required by the "Monitoring Program" complete with an interpretation and discussion of the results, in the Licensee's Annual Report, as required per Part B Item 1, or as requested by an Inspector.	<i>Failure to include sampling results in Annual Report (AANDC Inspection August 19, 2014).</i>	All data and information required by the Monitoring Program, including an interpretation and discussion of the results, will be including the Annual Report.	Hamlet of Rankin Inlet with assistance from CGS	Sampling results and interpretation will be included in the Annual Reports to be submit prior to the March 31st deadline each year, or as requested by an Inspector.	Sampling results d interpretation will be included in the Annual Reports to be submit prior to the March 31st deadline each year, or as requested by an Inspector.