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AANDC also recognizes that the current water licence is expired and that a renewal application has been submitted to the NWB.

To this end, AANDC has determined that it is not in the public interest to pursue further action beyond the items initiated through the Municipal Water Licence Compliance.”

A copy of this letter is provided to the NWB with this submission for completeness. AANDC identified two requirements that would be inspected during the 2015 municipal inspection season. The Hamlet of Rankin Inlet is working in cooperation with the GN-CGS to meet these requirements.

AANDC provided comments on the amendment/renewal application to the NWB on July 3, 2015. Please see below for a response to these comments:

1) Operation and Maintenance (O&M) Plans

The *Environmental Emergency Contingency Plan* and *Operation and Maintenance (O&M) Plan for the Solid Waste Site* have been updated and submitted to the NWB. The Licensee requests that if further revisions are required to the Plans, the NWB incorporates these as conditions of the new Licence.

2) Landfill – Commissioning/Decommissioning

As outlined in the application cover letter, there are no plans to commission the new Solid Waste Site or to decommission the existing Solid Waste Site. The Hamlet of Rankin Inlet will continue to use the existing Solid Waste Site. The application requested that conditions regarding the commissioning of the new site or the decommissioning of the existing site be removed from the Licence. In the future, if the Licensee is contemplating an alternative Solid Waste Site, an Amendment Application will be submitted to the NWB for approval of this new site and of the abandonment and restoration of the existing Solid Waste Site.

3) Landfill - Leachate

The Hamlet of Rankin Inlet collects samples from Monitoring Program Station Number RAN-2 located within the ponded area at the back of the Solid Waste Site. The results of this sampling are provided in the Annual Report to the NWB.

4) Landfill – Contaminated Soil

The Hamlet of Rankin Inlet does not accept contaminated soil at the Solid Waste Site.



5) Landfill – Hazardous Waste

As with many other communities in Nunavut, historical wastes at the Solid Waste Sites are an ongoing issue. The Water Licence Compliance Working Group, comprised of SAOs, municipal operations directors/supervisors, GN-CGS municipal engineers, AANDC and GN Department of Environment, has prepared the *Solid Waste Workplan* identifying short, medium, and long-term goals that must be met to improve municipal solid waste within the territory.

Improving hazardous materials handling, storage and removal has been the priority short-term goal of the first year of the Workplan. The 2015 municipal AANDC inspections have been focusing on determining if the Hamlets are meeting this goal. The Hamlet of Rankin Inlet has segregated batteries and has built battery boxes for proper storage within a seacan. Work is also being completed to palletizing barrels/drums (in groups of 4), move these pallets to a designated area at the Solid Waste Site, and ensure all barrels/drums have lids to prevent spillage/overtopping.

6) Landfill - Segregation

As described above, the Hamlet of Rankin Inlet has been improving their hazardous materials segregation. Additional segregation for wood items and bulky metals is taking place. Signage has been installed at the Solid Waste Site identifying the appropriate disposal locations of these items.

7) Landfarm - Operation

Contaminated soil is not being accepted at the Landfarm and the Licensee wishes to decommission the Landfarm and remove the Landfarm as part of the municipal Licence. While the Licensee acknowledges that they did not comply with the condition of the to install monitoring wells, resources would better be used to carry-out the work needed to abandon and restore the Landfarm, than to install groundwater monitoring wells for a facility that will be decommissioned as soon as possible.

8) Landfarm – Abandonment and Restoration

An Abandonment and Restoration Plan for the Landfarm will be submitted to the NWB for approval a minimum of six (6) months prior to abandonment of the Landfarm. The NWB can expect this plan by January 31, 2016.

9) Environmental Emergency Contingency Plan

The contact information for the AANDC Manager of Field Operations has been corrected in the updated version of the *Environmental Emergency Contingency Plan*.

10) Annual Reports

The 2013 Annual Report was completed prior to its deadline of March 31, 2014, however it appears that the report was not submitted to the NWB at that time. The 2013 Annual Report was provided to Christine Wilson, Water Resource Officer with AANDC following the 2014 Inspection. A copy of the 2013 Annual Report is included in this submission for completeness.

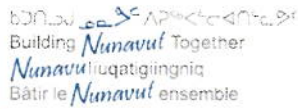
Sampling that was not completed in previous years cannot be done retroactively. The Hamlet of Rankin Inlet is committed to completing all monitoring requirements going forward. Details on the 2015 Monitoring Program can be seen in the response to comments on monitoring.

11) Monitoring

Monitoring Program Station Number RAN-2 was monitored weekly beginning in May 2015. This site remained frozen until June when monthly sampling began. Samples to be analyzed for the parameters outlined in Part H, Item 2 of Licence No. 3BM-RAN1214 were taken on June 25, 2015, July 22, 2015, and August 25, 2015. Included with this submission are Certificates of Analysis from samples taken on June 25, 2015 and July 22, 2015, as well as the Sample Receipt Confirmation for samples taken on August 25, 2015. The August 25, 2015 sample results have not yet been distributed by the lab, however they will be included in the 2015 Annual Report.

As with 2015, the only Monitoring Program Station that was sampled in 2015 was RAN-2. Please refer to the following table for a summary of why other stations were not sampled.

Monitoring Program Station Number	Description	Status	2015 Sampling
RAN-1	Unassigned	Inactive	<i>Sampling not required</i>
RAN-2	Runoff from the Old Landfill	Active	<i>Station frozen May 2015; Sampled June 25, July 22, and August 25, 2015.</i>
RAN-3	Runoff from the New Landfill	Active Upon Commissioning	<i>New Landfill not commissioned – sampling not required</i>



RAN-4	Discharge from the Landfarm Facility at the controlled point of release	Active	<i>No discharge from the Landfarm – no sampling</i>
RAN-5	Monitoring well located up gradient of the Landfarm	Active	<i>No monitoring well installed – unable to sample</i>
RAN-6	Monitoring well located down gradient of the Landfarm	Active	<i>No monitoring well installed – unable to sample</i>

The Licensee requests that a 10 year licence term is granted in order to give the Hamlet of Rankin Inlet sufficient time to implement the updated plans and complete goals outlined in the *Solid Waste Workplan*.

Man. Ind.

cc: Ralph Ruediger, Director of Community Development, GN-CGS
Cynthia Ene, Technical Advisor, NWB
Robin Ikkutisluk, Licensing Administrative Assistant, NWB
Atuat Shouldice, Water Resource Officer, AANDC
Justin Merritt, Acting SAO, Hamlet of Rankin Inlet

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