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[Licensing] 3BM-RAN1214

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Thu, Jul 23, 2015 at 4:50 PM

To: "Lusty, Megan" <MLusty@gov.nu.ca>

Cc: Licensing Department < licensing@nwb-oen.ca>

The Nunavut Water Board acknowledges the applicant's request to submit the outstanding revised Solid Waste Management O&M Plan by the 31st of August 2015.

The Board requests that the following outstanding items be submitted in order to continue the processing of the Hamlet of Rankin Inlet's renewal/amendment application, Water Licence No. 3BM-RAN1214:

- 1) Part F, item 3: The Licensee shall submit to the Board for approval, within ninety (90) days of Licence issuance, a revision to the *Environmental Emergency Contingency Plan, Hamlet of Rankin Inlet*, dated December 2008, consisting of:
 - a. An executive summary in English and Inuktitut;
 - b. A Landfarm Operational Contingency Plan to deal with seepage from the facility;
 - c. A map of the 50 year flood plain relative to the Landfarm Facility and Waste Disposal Facilities;
 - d. The use of secondary containment or surface liners (drip pans, fold a tanks, etc.) under all containers and vehicle fuel tank inlet and outlet points, hose connections and hose ends during fuel or hazardous substance transfers;
 - e. An outline of appropriate spill response equipment and clean-up materials (absorbents, containment devices, etc.) to be on hand during any transfer of fuel or hazardous substances and at vehicle maintenance areas;
 - f. Updated contact information for the AANDC Field Operations Division; and
 - g. The locations of all hazardous materials, spill response equipment and clean up materials.
- 2) Part F, item 2: The Licensee shall submit to the Board for approval, within ninety (90) days of Licence issuance, a revision to the *Solid Waste Management Facility Operation and Maintenance (O&M) Plan Hamlet of Rankin Inlet*, dated December, 2008, to address the following:
 - a. An executive summary in English and Inuktitut;
 - b. Procedures for the testing and characterization of sewage sludge generated by the Hamlet of Rankin Inlet under Licence 3AM-GRA1015 to ensure the materials are non-hazardous and proper storage and/or handling and disposal at the Waste Disposal Facilities are provided;
 - c. Updated monitoring requirements in accordance with the Monitoring Program outlined in Part H;
 - d. Types of wastes suitable for treatment in the Landfarm Facility in accordance with the definition provided in Part A of the Licence for Petroleum Hydrocarbon Impacted Soil;
 - e. Recommended depths of contaminated soil placed in the Landfarm Facility;
 - f. Independent third party sampling and testing of treated soil prior to removal from the Landfarm Facility for reuse; and
 - g. Landfarm Facility Effluent quality criteria in accordance with Part D;
- 3) The renewal & amendment application cover letter submitted states that "there are no plans to commission" a new Solids Waste Site, while also stating that "resources would better be used to carry-out the work needed to abandon and restore this site, than to install groundwater monitoring wells for a facility that will be decommissioned as soon as possible". The NWB requests that the applicant provide information to the board regarding plans for the current landfill as well as the new landfill.
- 4) On July 3, 2015, the NWB received AANDC's memorandum, comments and recommendations as they pertain to the Hamlet of Rankin Inlet's renewal and amendment application of Water Licence No. 3BM-RAN1214. The NWB has attached these for your review and requests that the applicant provide a response to the non-compliance issues identified during AANDC's 2014 site inspection (August 19, 2014).

Please do not hesitate to contact me if you have further questions and comments. The Board is willing to develop a revised compliance plan with the applicant in order to maintain a timely renewal/amend process.



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