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NUNAVUT WATER BOARD  
NUNAVUT IMALIRIYIN KATIMAYINGI  
OFFICE DES EAUX DU NUNAVUT

File No.: **3BM-SAN1520**

July 12, 2018

Michael Rowan  
Hamlet of Sanikiluaq  
P.O. Box 157  
Sanikiluaq, NU X0A 0W0

Email: [sanisao@qiniq.com](mailto:sanisao@qiniq.com)

**RE: NWB Technical Review of 2017 Annual Report for the Hamlet of Sanikiluaq; Water Licence No. 3BM-SAN1520**

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Dear Mr. Rowan:

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 2:

The Licensee shall measure and record, in cubic metres, the daily, monthly, and annual quantities of Water extracted for all purposes at Monitoring Program Station SAN-1.

The Annual Report did not provide daily quantities or quantities in cubic metres for SAN-1. Monthly and annual quantities from the On Tap Water Delivery System were provided in Litres. While the On Tap Delivery System can act as an effective surrogate for SAN-1, it should be explicitly explained in the Annual Report.

- 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 SAN-3.

The Annual Report did not provide daily quantities for SAN-3. Monthly and annual quantity estimates of sewage based on the On Tap Water Delivery System was provided in Litres. While the On Tap Delivery System can act as an effective surrogate for SAN-3, it should be explicitly explained in the Annual Report.

- Part H, Item 4:

The Licensee shall measure and record in cubic metres, when flow is occurring, the monthly and annual quantities of Effluent discharged from SAN-4.

The Annual Report did not provide any quantity information for SAN-4.

- Part H, Item 8:

The Licensee shall sample for Water quality analysis at Monitoring Stations SAN-2 and SAN-5 once per month in June, July and August during periods of observed flow. Samples shall be analyzed for the parameters listed in Part H Item 6, as well as Total Petroleum Hydrocarbons.

The Annual Report did not provide any analytical information for SAN-2 or SAN-5.

- Part B, Item 1d states that the Annual Report will contain:

the daily, monthly and annual quantities in cubic metres of sewage effluent discharged; and the monthly and yearly quantities of every type of Waste:- landfill, bulky metal, hazardous, wood and soil—accepted at the Solid Waste Facilities; the total volume of sludge removed from the sewage lagoon and the disposal method;.

The Annual Report did not provide any quantity information for solid waste (bulky metal, hazardous, wood and soil).

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 Board has approved the Manual entitled “Operation and Maintenance Manual of Water Truck Fill Station Municipality of Sanikiluaq, Vol. I and II” dated July 2011 submitted as additional information with the Application. The Licensee shall submit to the Board for review, within ninety (90) days from the date of issuance of this Licence, **an updated O&M Manual**.

The updated O&M Manual shall include a Spill Contingency Plan (SCP) for the Water Supply Facility, prepared in the format set out by the Consolidation of Spill Contingency Planning and Reporting Regulations R-068-93, the SCP shall include a detailed description of the secondary system employed to prevent spills.

To date, the NWB has no record of receiving this information which was due on August 12, 2015.

- Part F, Item 3:

The Board has approved the Solid Waste Operation and Maintenance Plan for the Hamlet of Sanikiluaq, dated September 2014, submitted as additional information with the Application. The Licensee shall submit to the Board, for review, within ninety (90) days from the date of issuance of this Licence, **an updated O&M Plan**. The updated Plan shall include a revised “Hazardous Waste Management Procedure” (HWMP) for the Solid Waste Facility. The revised HWMP shall include but not be limited to the following:

- a. date of issuance;
- b. period of cover;
- c. considerations related to fencing;
- d. considerations related to signage;
- e. inventory of hazardous Waste;
- f. hazardous Waste runoff management;
- g. a description of how facilities are operated and maintained and how often these tasks are performed; and
- h. name of the person responsible for the Facility operations.

To date, the NWB has no record of receiving this information which was due on August 12, 2015.

- Part F, Item 5:

An inspection of all engineered facilities related to the management of Water and Waste shall be carried out by an Engineer at a minimum of once annually, and before commissioning any engineered facility related to the management of Water and

Waste. The **Engineer's report** shall be submitted to the Board within sixty (60) days of the inspection, including a cover letter from the Licensee outlining an implementation plan to address each of the Engineer's recommendations.

To date, the NWB has no record of receiving this information for the 2017 inspection.

- Part G, Item 6:

The Licensee shall submit to the Board for review, within ninety (90) days of issuance of this Licence, a **Closure and Remediation Report** for the "contaminated site" including:

- a. mapped GPS coordinates delineating the extents of the disposal areas (metal waste site, landfill site and unauthorized disposal site) referred to in Figure 2 of the Solid Waste Operation and Maintenance Plan; and
- b. a work Plan to assess, close and remediate the unauthorized disposal areas.

To date, the NWB has no record of receiving this information which was due on August 12, 2015.

The NWB strongly recommends that the Licensee address issues identified in 2017 by the Inspector<sup>1</sup>. Please provide a brief summary of work done to address concerns or deficiencies listed in the inspection reports and/or compliance reports prepared by an Inspector or other parties in the 2018 Annual Report.

Should you have any questions, please feel free to contact us at (867) 360-6338, at your earliest convenience.

Sincerely,

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Richard Dwyer  
Nunavut Water Board,  
Manager of Licensing

Cc: Distribution List – Qikiqtani

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<sup>1</sup> Indigenous and Northern Affairs Canada (INAC) Inspection Report, June 13, 2017