



MUNICIPAL WATER USE INSPECTION FORM

Date: July 15, 2013	Licensee Rep. (Name/Title): Christopher Dickson SAO. Shah Alam - Government of Nunavut. James Ashavak – Water Treatment Plant Operator
Licensee: Hamlet of Taloyoak	Licence No.: 3BM-TAL0813

Comments: Mr. James Ashevak (WTPO) from the Municipality joined the inspection and provided support for the duration of the sampling and Inspection. Mr. Shah Alam, from the Government of Nunavut also attended for the duration of the Inspection. This inspection was completed to determine the state of compliance with the Compliance Plan submitted by the Government of Nunavut's Department of Community Government and Services (GN-CGS). Currently the Municipality has a License that was issued for water usage and not waste disposal. This License will expire in less than 90 days. A review of the Nunavut Water Board (NWB) FTP site notes that no documents in support of an application for renewal of the current Water license have been submitted since 2010.

WATER SUPPLY

Source(s): CANSO Lake	Quantity used: Unknown
Owner:/Operator: Hamlet of Taloyoak	

Indicate: A - Acceptable U - Unacceptable NA - Not Applicable NI - Not Inspected

Intake Facilities: A	Storage Structure: A	Treatment System: A	Chemical Storage: NI
Flow Meas. Device: A	Conveyance Lines: A	Pumping Stations: A	Screen: NI

Comments: During the Inspection of the Water Treatment plant the Inspector noted the following;

- Samples were collected from the raw water sampling port TAL -1.
- Water sampling and daily testing records were found complete and well organized during an inspection of the Water Treatment Facility.
- Chlorine test results reflected consistently high free chlorine levels recorded in testing. When traced back it appears that the mixing tub had not been cleaned out prior to mixing the next batch and may have resulted in excess chlorine being transferred to the pumping units. This is being worked on by the municipal staff and the CG&S representative and will be confirmed this week following the inspection.
- Chlorination treatment systems (main and redundant (2)) were both working on site
- The Licensee is reminded that Chlorine must be stored and secured properly to prevent leaks.
- Operations and Maintenance Manuals were found on site.
- It is unclear at this time what the plan is to address the old intake pumping station and tanks in the old facility. The licensee remains adamant that the facilities are required for firefighting capacity in the community as the new facility is not able to pump fast enough to fill the fire trucks. If these tanks and pumping station are to be removed then the required abandonment and restoration plan must include these facilities. It is noted that in the submitted Compliance Plan the required A&R Plan was to be provided by June 1st, 2013.

WASTE DISPOSAL

Sewage: Sewage Treatment System (Prim./Sec/Ter.): Primary – Discharge to pond and river system.

Natural Water Body: Yes	Continuous Discharge (land or water): No	
Seasonal Discharge: None	Wetlands Treatment: Unknown	Trench: None

Indicate: A - Acceptable U - Unacceptable NA - Not Applicable NI - Not Inspected

Discharge Quality: U	Decant Structure: U	Erosion: NI
Discharge Meas. Device: NA	Dyke Inspection: NA	Seepages: U
Dams, Dykes: NA	Freeboard: NA	Spills: U
Construction: NA	O&M Plan: U	A&R Plan: U
Periods of Discharge: Cont.	Effluent Discharge Rate: Unknown	

- Part D: Conditions Applying to Waste Disposal is specifically excluded from the currently issued license. This is a result of the Licensee (or their agent) not providing complete and accurate information to the Nunavut Water Board during the application process.
- The current license was issued in 2008 and based on information provided by the Licensee (or their agent) solely to facilitate the construction of the new Water transfer facility (pump house) to address issues identified in Inspections dating back to 2002.
- As such the Licensee is currently depositing waste (municipal waste, solid (metals) and sewage) in facilities owned and operated by the Licensee without the authority of a license
- The Licensee is required to seek amendments to this License in order to have its Wastewater Treatment and Solid Waste Management activities permitted under a Water License.
- Specific issues identified during the inspection of the Sewage Treatment System include;
 - Raw effluent is deposited into a pond system that naturally flows into a stream and eventually into the ocean. It is unclear what the retention time is in the pond and/ or if proper treatment is being effected
 - The facility is not properly fenced nor is there any signage or warnings posted
 - An Operations and Maintenance Manual has not been submitted for review as required
- The Inspector has observed that none of the issues identified during inspections conducted since 2008 have been addressed by the Licensee or CGS for the last five years.
- The Compliance Plan submitted by the Government of Nunavut indicates that an application for renewal of the existing Water License would be submitted to the NWB by June 30th, 2013. This has not occurred.

Landfill: Y	Burn & Landfill: Y	Other:
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- Waste within the Solid Waste Management area remains un-segregated. Barrels of unknown substances, waste oil, batteries, and household chemicals are not being sorted out of the waste stream and placed in containment.
- Lack of signage including warnings at the facility.
- Proper “policing” of the facility is still required.
- The municipal burn and bury facility requires cover material as open burned garbage and debris was noted blowing around and being ejected from the facility during the inspection.

Indicate: A - Acceptable U - Unacceptable NA - Not Applicable NI - Not Inspected

Berms & Liners: NI	Water within Berms: NI	Evidence of Leaks: NI
Drainage Pipes: NI	Pump Station & Catchments Berm: NI	
Pipeline Condition: NI	Condition of Tanks: NI	

Waste Oil Storage: Noted both within and adjacent to the solid waste management facility and at the Hazardous Materials Area. Barrels were found to be stored leaking outside the Hazardous Material Area.

Samples Collected		Owner /Operator: Samples collected one week before the inspection	
3		AANDC: Potable water source, Effluent, Leachate- Poned water within the SWMF	
Signs Posted	SNP: Tal-1,Tal,2 and Tal-3	Warning: None.	
Records & Reporting: Records of daily checks and sampling at Water Treatment were noted.			
Geotechnical Inspection: N/A			



Non-Compliance of Act or Licence: The Inspector identified the following issues during the period of the inspection;

As noted in previous Inspection reports filed with the Municipality of Taloyoak and the Nunavut Water Board the current license issued to the Municipality of Taloyoak does not allow for any activities related to sewage disposal, treatment and discharge or solid waste collection, containment or disposal. The Municipality still engages in these activities but has failed over the life of the current license to provide sufficient information to the Nunavut Water Board to begin the application process to amend the license for inclusion of these activities. It was noted that the Municipality does not have the information required by the Nunavut Water Board to address these deficiencies. In fact it has been identified every year since 2009 that the information required by the Board is in the hands of the Department of Community Government and Services and their consultants and contractors. This information has been requested by the Inspector and the Nunavut Water Board on numerous occasions but has not been provided to the Licensee, the Nunavut Water Board or the Inspector to date.

In March 2013 the Government of Nunavut, in response to an Inspector's Direction submitted a Compliance Plan detailing how the identified issues of Non-compliance would be addressed and provided mile stone dates for the submission of outstanding plans, drawings, and documents. The Compliance Plan specifically stated that an application for the renewal of the current license with all outstanding information (as required for the application to be accepted by the Nunavut Water Board) would be submitted by June 2013. To date the Inspector can find no evidence that this work has been accomplished or in fact even initiated by the Government of Nunavut. This was confirmed by the Regional Engineer during the Inspection.

With respect to the submitted Compliance Plan, the Inspector found as follows;

- B-1. The Government of Nunavut committed to providing a report prepared by their consultants following the community visit that was to be held in Taloyoak prior to the end of February 2013. This report was to have been submitted to the NWB prior to March 31st 2013. The report has not been submitted.
- B-2. The Government of Nunavut committed to providing an Action Plan including QA/QC protocols to the Nunavut Water Board by June 1st, 2013. This report was to have been based on a report prepared by their consultants. As of July 15th, 2013 the day of the Inspection, this Plan had not been received by the Board.
- B-2. The Government of Nunavut committed to providing a Monitoring program to the Municipality of Taloyoak by June 1st 2013. As of July 15th, 2013 the day of the Inspection this Plan had not been received by the Municipality or the NWB.
- B-5. The Government of Nunavut committed to conducting research on the available reports and plans that remain outstanding with the Nunavut Water Board and submit by June 1st, 2013 these to the Board. As of July 15th, 2013 none of the outstanding reports or a detailed report on what remains outstanding, has been submitted.
- E-3. The Government of Nunavut committed to providing a report on the status of modifications to the Nunavut Water Board by March 15th, 2013. Further, a concurrent effort to determine the availability of as-built drawings was committed to and the findings of this effort and all available drawings were to have been submitted to the Board by March 15, 2013 with any outstanding drawings to be submitted in September of 2013. As of July 15th, no new documents have been submitted to the Board with respect to these items.
- F-1. The Government of Nunavut committed to developing and providing a report on the status of the O&M Manual as part of the Community Visit Report prior to March 31st, 2013. This report has not been submitted to the Inspector or the Nunavut Water Board. Draft manuals were to be been submitted to the NWB by July 1st 2013 but as of July 15th, 2013 this has not been done.



- G-1. The Government of Nunavut committed to providing a report on the Scope of the Abandonment and Restoration Plans for infrastructure by June 1st, 2013. As of July 15, 2013 this has not been submitted.

Finally, a revised and amended application for a water license was to have been submitted to the NWB by June 1st, 2013. This was specifically to have addressed waste management and licensing however as of July 15th 2013 this had not been submitted.

In conclusion the Government of Nunavut has not to-date, fulfilled the majority of their commitments made in the submitted compliance plans and as such is in violation of the Inspectors Direction originally served on Minister Kusugak on the 1st of May 2012.

The Licensee and the Government of Nunavut are reminded that the result of failing to follow and adhere to a Direction issued by an Inspector constitutes a offence under subsection 90 (1) of the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and entails, upon summary conviction, a fine of \$100,000 or to imprisonment for a term of one year, or both.

Further pursuant to subsection 90 (4) of the *Nunavut Waters and Nunavut Surface Rights Tribunal Act*, each day on which the Inspector's Direction is not complied with shall be considered a separate offence.

Signature Block:

Andrew Keim

Inspector's Name

Sent by E-mail (Original signed and on file)

Inspector's Signature

Cc:

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