

WATER LICENCE INSPECTION FORM

☒ Original

☐ Follow-Up Report

Licensee		Licensee Representative	
Municipality of Taloyoak		Greg Holitzki and James Ashavak	
Licence No. / Expiry		Representative's Title	
3BM-TAL 0813    Expired on Sept 30, 2013		Senior Administrative Officer , Water Treatment Plant Operator.	
Land / Other Authorizations		Land / Other Authorizations	
Date of Inspection		Inspector	
22/08/2014		A.Keim	
Activities Inspected			
<div><input type="checkbox"/> Camp    <input type="checkbox"/> Drilling    <input type="checkbox"/> Mining    <input type="checkbox"/> Construction    <input type="checkbox"/> Reclamation    <input type="checkbox"/> Fuel Storage</div> <div><input type="checkbox"/> Roads/Hauling    <input type="checkbox"/> Other: Water Discharge    <input checked="" type="checkbox"/> Other: Municipal</div>			

Conditions:

A - Acceptable

C - Concern

U - Unacceptable

NA – Not Applicable

NI – Not Inspected

Water Use	Condition	Comment	Site Conditions	Condition	Comment	Haz/Mat Management	Condition	Comment
Intake/Screen	A		Water Management Structures			Storage	NA	
Flow Measure. Device	NI		Culverts / Bridges	NA		Spills	NA	
Source: Canso Lk.			Drainage	NA		Spill Plan	NA	
Water Use:	A		Erosion / Sediment	NA				
Recirculation ( y /n)	N		Mitigation Measures	NA		Administrative		
			Reclamation Activities	NA		Records	A	
			Materials Storage	NA		Reports	C	1
Waste Disposal			Signage	U	1	Plans	C	1
Waste Water	NA					Notifications		
Solid Waste	NA	1	Monitoring			Other		
Hazardous Waste	NA	1	Sample Collection / Analysis	U	1	Comments	C	3

\*The number in the comments field will correspond with specific comments provided below.

Samples taken by Inspector:

☒ Yes    ☐ No

Location(s): Potable Source, Municipal waste management area run off, Effluent outfall

SECTION 1	<input checked="" type="checkbox"/> Comments (s.____)	<input type="checkbox"/> Non-Compliance with Act or Licence (s.____)	<input type="checkbox"/> Action Required (s.____)
<p>Mr. Shah Alam, Regional Engineer, Department of Community and Government Services attended the Inspection on behalf of the Government of Nunavut. Mr. Alam participated in the Inspection could provide no information on plans to bring the community of Taloyoak into compliance with the Legislation.</p> <p>The Inspection was completed to determine both the state of compliance with the Direction issued to the Government of Nunavut in 2012 requiring the submission and implementation of compliance plans to achieve compliance with the Act and to renew the expired Water License as well as achieve and then maintain compliance with the terms of the existing but expired water license in the interim. At the time of the Inspection the Water License for the community had expired 11 months previously. A review of the Nunavut Water Board FTP site during the period of Inspection identified that an application for renewal has been submitted to the Board by the Government of Nunavut on behalf of the Municipality.</p> <p>Included within the application were;</p> <ul style="list-style-type: none"><li>A number of outstanding Annual Reports</li><li>A renewal Application</li><li>A sampling training Program completed by a consultant</li><li>A revised compliance plan</li><li>A number of as-build drawings of the newly constructed water intake facility</li></ul> <p>The Board is still waiting for a number of items and as such the Application remains incomplete and has not yet been reviewed by the Board.</p> <p><b>Inspection:</b></p> <p><b>Water Use:</b></p> <p>During the period of Inspection a site visit to the new Intake facilities was conducted with Mr. Shah Alam and James Akakvak. The Spill outside the facility noted in 2013 had been cleaned up and no new fuel spills from overfilling of the tank were identified.</p> <p>The Intake station was found in excellent working order with all regular maintenance and records available for review during the period of Inspection.</p> <p>It remains unclear what the plan is to deal with the old intake station. Abandonment and Restoration plans have not been submitted by the Government on behalf of the Municipality to date for these facilities. Mr. Shah had no information to add during the period of Inspection. It is noted that this Plan was due on June 1<sup>st</sup> of 2013 in accordance with the submitted Compliance Plan.</p>			

Samples were collected during the period of Inspection by both the Inspector and the Licensee.

Waste Disposal:

It is again noted that the process of waste disposal was not included within the terms of the now expired license and as such the Act only applies and all deposits of waste remain unlicensed and constitute offences under the Act.

The Government of Nunavut and the Licensee have had over 5 years to address this issue and has yet have not submitted any substantive plans, manuals, applications or documents related to the deposit of waste and or bring the licensee into compliance and as such were included in the Inspector’s Direction issued in July of 2012 by Aboriginal Affairs and Northern Development Canada.

Solid Waste Management:

During the period of Inspection the Solid Waste Management Facility was inspected and found to be unsorted, un-segregated with little to no cover materials being placed over the Municipal waste site. It was however noted that a fence remains in place to prevent ejection of materials from the facility following deposit.

Samples were collected by both the Licensee and the Inspector at a site that was identified as containing run-off from the facility.

Hazardous Wastes:

The Licensee has a fenced and secured Hazardous waste facility within the municipality. That site however is not properly managed with barrels of both known and unknown contents found both inside the facility and outside the facility. Number leaks and spills both inside and outside the facility were found and documented. Monitoring wells were identified however no scheduled sampling program has been undertaken by the Licensee or the Government of Nunavut to monitor the site. A large volume of water is trapped within the facility that shows an obvious sheen. This water appears to overtop the surrounding materials and exit the facility however it is unclear for how long this has been occurring. Neither the Licensee nor the Regional Engineer Mr. Alam were able to provide any information on the facility nor could either say with any certainty if the facility was lined or not.

It appears the facility may have been designed to also incorporate a land farming facility however this is not included in any plans, the previous license or any manuals submitted by the Government or licensee to the Nunavut Water Board or found on the FTP site.

This site did not have a location for the collection and storage of Batteries.

Waste Water:

Raw effluent continues to be deposited by truck into a pond and stream system that flows overland down to the ocean. It is impossible to determine the holding time or level of treatment from these facilities.

A sampling location was identified in previous inspections and samples were collected by both the Inspector and the Licensee during the Inspection.

There was noted a lack of signage at the truck drop off and turn around.

A review of the Nunavut Water Board FTP site could not locate an Operations and Maintenance manual for the facility. This omission has been identified in every inspection conducted since 2008 and has yet to be addressed.

SECTION 2	<input type="checkbox"/> Comments (s.__)	<input checked="" type="checkbox"/> Non-Compliance with Act or Licence (s.__)	<input type="checkbox"/> Action Required (s.__)
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Non-compliance related to the now expired license;

- Part B (1) Failure to submit complete and accurate Annual Reports
- Part B (10) Failure to submit for approval and then implement the terms contained within a Compliance Plan including an implementation schedule, to achieve full compliance with the conditions of this Licence, including the approval of the waste water and solid waste disposal facilities.
- Part F - Failure to submit Operations and Maintenance manuals as required for the deposit of waste within the municipality.
- Part G - Failure to submit all Abandonment and Restoration Plans.
- Part H – Failure to fully implement the requirements listed under the Monitoring Program.

The Nunavut Waters and Nunavut Surface Rights Tribunal Act;


12. (1) Subject to subsection (2) and except in accordance with the conditions of a licence, no person shall deposit or permit the deposit of waste

(a) in waters in Nunavut; or

(b) in any other place in Nunavut under conditions in which the waste, or any other waste that results from the deposit of that waste, may enter waters in Nunavut.
- (2) Subsection (1) does not apply in respect of

(a) any unlicensed deposit of waste that is authorized by the regulations; or

(b) the deposit of waste in a national park.
- Compliance Plan
- D-5. Failure to submit a complete application for renewal that includes all required documentation for the addition of Waste disposal within the Municipality

F-1 Submission of Operations and Maintenance manuals for both the Solid Waste facilities and Waste water Facilities within the
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IQALUIT#818092 - v1  
IQALUIT#868323 - v1

Municipality.

G-1 Submission of Abandonment and Restoration Plans as required

It is noted that there seems to be some confusion over the requirement to submit the above plans. To be clear, these plans are mandatory and are required to be submitted to allow the Board to properly review and develop the appropriate terms and conditions for licensing within the community. The submission that these documents are not required because the facilities already exist does not exempt the Government nor the licensee from developing and submitting them.

If necessary a Direction to develop and produce these manuals can and will be issued in the event they remain outstanding past the March 31<sup>st</sup> deadline for submission of the Annual Reports.

SECTION 3

☒ Comments (s.\_\_)

☐ Non-Compliance with Act or Licence, (s.\_\_)

☐ Action Required (s.\_\_)

Following the Inspection conducted in the Municipality the SAO has contacted the Inspector with respect to changes, modifications and improvements made within the community by the Licensee. These included ;

- Implementation of a policy to police and properly manage the hazardous materials/ land farm facility including; Transplanting barrels from outside the facility, into it properly on Pallets. Stacking and organizing the facilities stock of unknown barrels, having hydrocarbon contaminated soils removed by contractors for shipment off site and out of the community at their costs. Implementing a fee for deposit and looking to work with Government on a plan to properly manage the facility and treat wastes.
- Sorting and segregation of hazardous materials at the solid waste management facility. The installation of a sea-can for storage of these wastes for packaging for shipment off site.
- The use of cover materials and proper sorting procedures at the solid waste management facility
- The implementation of increased tipping fees to use to manage the facility.

All of these solutions were brought about by the commitment of the hamlet council and the SAO and have been implemented with various levels of success while finding their way toward legislative compliance and the management of wastes within the system. The Municipality understanding that while they are not currently in compliance these efforts will assist them in the management of their waste stream and eventually lead to a better waste management program in the community.

These efforts are recognized and while there remains a great deal of work left to accomplish and work that requires the assistance of the Government of Nunavut the Municipality is moving forward toward compliance.

Photo Log			
Date	Authorization	Camera	Inspector
August 22 2014	3BM-TAL0813	Sony Cyber shot	A. Keim



Figure 1 Intake and Treatment Facility Taloyoak





Figure 2 Fuel tank outside Facility. Double walled



Figure 3 Canso lake behind Tank - Taloyoak



Figure 4 Filters in Treatment Facility

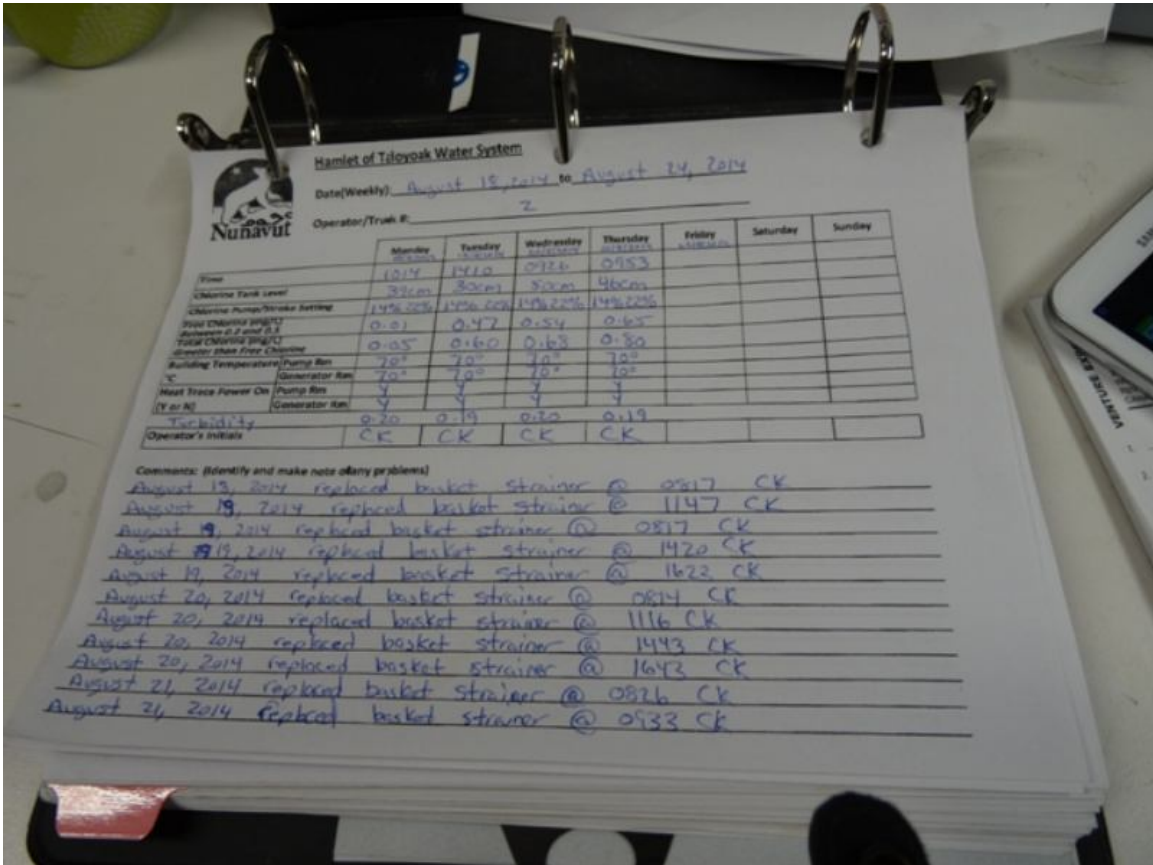


Figure 5 maintenance and Testing records in facility - Taloyoak





Figure 6 Trible redundant chlorination system - Taloyoak



Figure 7 Mixing tank



Figure 8 Hazardous wastes, contaminated soils storage and Landfarm - Taloyoak



Figure 9 Barrels of unknown origin outside facility in Taloyoak





Figure 10 Contaminated soils deposited by Contractors in facility without the permission of Municipality



Figure 11 Water Trapped within the facility





Figure 12 Drums of Unkown contents and origin within the facility



Figure 13 material left on roadway and entrance to facility



Figure 14 Old fuel stored outside the facility



Figure 15 Solid Waste Management Area - Unlicensed





Figure 16 SWMA - Taloyoak



Figure 17 SWMA - Un segregated and not policed



Figure 18 Municipal Waste Managment Area



Figure 19 Municipal Waste Management Area





Figure 20 Truck Drop off at Waste Water Facility - Pond



Figure 21 Pond



Figure 22 Final Point of control from the Waste Water Treatment Facility - Pond

Licensee or Representative	Inspector's Name
	A.Keim
Signature	Signature
	Sent by Email – Original on File
Date	Date
	November 5 2014

Office Use Only:	Follow-up report to be issued by Inspector	<input type="checkbox"/> Yes <input type="checkbox"/> No
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