File No.: **3BM-WHA1520**

July 12, 2018

Ian Copeland Senior Administrative Officer Hamlet of Whale Cove P.O. Box 120 Whale Cove, NU, X0C 0J0 Sarah Collins Municipal Planning Engineer Community and Government Services Kivalliq Region, Government of Nunavut P.O. Box 490 Rankin Inlet, NU, X0C 0G0

Email: sao@whalecove.ca Email: scollins@gov.nu.ca

RE: NWB Technical Review of 2017 Annual Report for the Hamlet of Whale Cove; Water Licence No. 3BM-WHA1520

Dear Mr. Copeland and Ms. Collins:

The Nunavut Water Board (NWB) has completed a technical review of the 2017 Annual Report.

On April 20, 2018, the NWB acknowledged receipt of the Annual Report and provided it to the Kivalliq 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 monthly and annual quantities of Water pumped at Monitoring Program Station WHA-1, for all purposes.

The Annual Report did not provide quantities in cubic metres for WHA-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 TAL-1, it should be explicitly explained in the Annual Report.

• Part H, Item 3:

The Licensee shall measure and record, in cubic metres, the monthly and annual quantities of Effluent discharged from Monitoring Program Station WHA-3.

The Annual Report did not provide daily quantities for WHA-3 in cubic metres. 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 WHA-3, it should be explicitly explained in the Annual Report.

• Part H, Item 6; Part H, Item 7; Part H, Item 8; Part H, Item 9; and Part H, Item 10.

These items all require monitoring and reporting on the Landfarm.

The Annual Report did not provide any information about the Landfarm.

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 E, Item 5:

The Licensee shall submit to the NWB for review, within ninety (90) day following the date of issuance of the Licence, a **status report for the Landfarm Facility** that includes among other relevant information, as-built drawings, signed and stamped by an Engineer.

To date, the NWB has no record of receiving this information which was due on September 3, 2015.

• Part F, Item 1:

The Licensee shall submit to the Board for review, within six (6) months following the issuance of the licence, a **Solid Waste Disposal Facilities Update Report** including photographic record, which demonstrates the implementation of measures recommended in the *Solid Waste Management Facility O&M Plan* to improve the existing or current facility.

To date, the NWB has no record of receiving this information which was due on December 4, 2015.

• Part F, Item 2:

The Licensee shall submit to the Board for Approval, within six (6) months from the date of issuance of this Licence, an **updated consolidated Operations and Maintenance (O&M) Manual** consisting of:

- a. Environmental Emergency Contingency Plan;
- b. Environmental Monitoring Program & Quality Assurance/Quality Control Plan;
- c. Sewage Treatment Facility Operation and Maintenance (O&M) Plan;
- d. Solid Waste Management Facility Operation and Maintenance (O&M) Plan; and
- e. Water Supply Facility Operation and Maintenance (O&M) Plan.

To date, the NWB has no record of receiving this information which was due on December 4, 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 14:

The Licensee shall submit to the Board for review, within six (6) months following the date of issuance of the licence, a **Quality Assurance/Quality Control (QA/QC) Plan**. The Plan shall include up-to-date sampling methods to all applicable standards, acceptable to an accredited laboratory as required by Part H, Item 12 and Part H, Item 13. The Plan shall include a cover letter from the accredited laboratory and Analyst, confirming acceptance of the Plan for analyses to be performed under this Licence.

To date, the NWB has no record of receiving this information which was due on December 4, 2015.

The NWB strongly recommends that the Licensee address issues identified in 2017 by the Inspector¹. 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.

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¹ Indigenous and Northern Affairs Canada (INAC) Inspection Report, July 11, 2017.

	l you have any questions about this review earliest convenience.	v, please feel free to contact us at (867) 360-6338
		Sincerely,
		Richard Dwyer Nunavut Water Board, Manager of Licensing
Cc:	Distribution List – Kivalliq	