



## 3BM-YRB0308, 2016 File Recap

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Thu, Mar 17, 2016 at 2:04 PM

To: "Roy, Bhabesh" <BRoy@gov.nu.ca>

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Good Afternoon Mr. Roy,

The renewal water licence application for 3BM-YRB0308 is dated November 28, 2008, and on May 15, 2009 the Nunavut Water Board (NWB) solicited comments for this application. In June of 2009, comments were received from:

- Indian and Northern Affairs Canada (INAC)
- Environment Canada (EC)
- Government of Nunavut - Department of Environment (DOE)
- The Government of Nunavut - Department of Culture, Language Elders and Youth (CLEY)

Please refer to the NWB's ftp site to view all received submissions: <ftp://ftp.nwb-oen.ca>

In INAC's submitted comments, dated June 4, 2009, INAC states that they cannot support the approval of the renewal of this licence until such time as the applicant:

- addresses operational non-compliance matters (identified in their submission)
- submits a compliance plan
- submits missing information (including required revisions to operational plans, waste/water quality sampling information, etc.)

On October 23, 2009, the NWB emailed a requirement for the applicant to submit a Plan for Compliance which demonstrates the ways and means the Licensee will undertake to achieve full compliance with the applicable Licence conditions and non-compliance issues identified by INAC. In subsequent years, since 2009, the NWB has provided a Plan for Compliance template and has continued to request for this compliance plan. Please note that the Plan for Compliance template is available on the NWB ftp site, within the ADMIN/GENERAL folder for the 3BM-YRB0308 file.

The NWB will be able to proceed with reviewing this renewal application when a Compliance Plan is submitted. The compliance plan, including firm timelines, will need to address the following:

1) Requirements of the expired 3BM-YRB0308 licence:

- Part C, Item 1 and 2 - The existing 3BM-YRB0308 licence permits the use of 600 cubic metres per year, from Strip Lake. It has been noted however that the submitted 2012 to 2015 annual reports show water consumption well above this amount. Most notably, the 2012 and 2013 annual reports which indicate that over 89,000 cubic meters of water was sourced from Char Lake. Submit information that addresses the following:
  - i. Is there any 'Off-stream storage of water' (reservoir capacity) of 60 000 m3 or more?
  - ii. Is there a use of water that exceeds 299 m3/day?
  - iii. Is water being collected from any other source than Strip Lake?
- Part D, Item 3 – Submit a Sewage Disposal Plan to address INAC's non-compliance concerns. (A Sewage Disposal Plan was also requested by EC and GN-DOE, in their June 2009 comments, as a "stand-alone sludge management plan", to be received by the NWB prior to the approval of this renewal license).
- Part D, Item 9 and Part H, item 1 – Submit a report identifying each Final Discharge Point (geo-referenced location and description). Use this Final Discharge Point description, i.e YRB-3, in the annual report and wastewater quality results from the lab. This will facilitate the review of the submitted annual reports and lab results, currently the lab results submitted to NWB show water quality information for sampling locations that are identified by different names each year: at times as "Lagoon", other times as "Airport Lagoon", or "Decanting Lagoon", and at other times with description names that appear to indicate the sample was collected for the 3BM-RUT1520 licence instead (with sample names listed as "Water Truck", "Utilidor Pipe", and "Utilidor Sewage Lagoon", etc.
- Part F, Item 3 – An updated O&M plan (with revised operational drawings, site pictures, updated contact information, etc.)
- Part F, Item 4 – A standalone Spill Contingency Plan (addressing the concerns raised by INAC and EC in their June 2009 submitted comments)
- Part H, Item 1 and 2 – Monitoring Program. The recently submitted 2015 annual report has no water quality information. The annual reports for 2012 to 2014 have some lab results, but the information submitted is incomplete. Part H, item 2 requires monitoring station YRB-3 be sampled monthly from the months of May through to August. If sewage

waste is discharged at different times of the year, please notify the NWB and make a note to have the sampling time/frequency amended in the water licence.

- 2) Address the concerns raised by INAC in their submitted June, 2009 review comments and subsequent inspection reports/non-compliance letters.
- 3) Address the concerns raised by EC in their June, 2009 review comments.
- 4) Address the concerns raised by GN, DOE in their June, 2009 review comments.

Please do not hesitate to contact the NWB if you have further questions.

Sincerely,



**Cynthia Ene, MBA, P.Eng.** - ᐃᓕᓕᓐ ᐃᓕᓐ

Technical Advisor - Conseillère Technique

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