

Weber Arctic Expeditions response to CIRNAC Review Licence 2BL-AWL1722 Renewal Application for the Arctic Watch Lodge Project in the Qikiqtani Region of Nunavut

May 17th, 2023

Your file - Votre référence
7BL-AWL1722
Our file - Notre référence
GCDocs#112745776

Weber Arctic Expeditions extends its appreciation to the waterboard and all involved parties for affording us the opportunity to respond to the concerns and questions raised regarding the renewal of the Arctic Watch Lodge water license. We are committed to enhancing our practices and adhering to high standards. We trust that our responses to your inquiries and concerns will contribute to the preservation of a harmonious environment.

We have not been inspected since 2019 at Arctic Watch Lodge; 2020 was Covid-19 year. The lodge was closed in 2020. We are scheduled for another inspection this July 2023. Many of the recommendations since 2019 have been assessed.

1. 2019 Inspection actions required

Actions required from the 2019 inspection included:

- reporting all spills as per the water license requirements;

Response: *Weber Arctic Expeditions will and does report any spills. There was never a spill in the ATV tent. Do you have any photos for reference? Our mechanical station for repairing atv's is on top of fuel berm material. We have spill pads and spill clean-up kits in the mechanical room, generator room and airstrip.*

- storing mobile sewage storage tank not within 31 meters of any water body:

Response: *This vehicle and mobile storage unit have been moved away from the 31 meters since then. It is on a vehicle and can move at any time.*

- 2022 calculating and articulating how the fuel cache secondary containment is able to contain a minimum of 110% of the original vessel, and 10% of the aggregate volume of all other vessels located in the containment, and/or install a proper secondary containment.

Response: *The berm is approximately 10 feet by 15 feet by 6 inches. This is 75 cubic feet. One drum is 7.3 cubic feet of fuel. The berm is big enough.*

- removing bulk metal and the incinerator as those sites are no longer covered under a land use permit, and should have been removed before the expiry of the Land Use Permit; and

Response: *What is this Land Use Permit? The location described with our hardware storage (not scrap metal) is now part of our lease. In 2021 we removed a substantial amount of bulk metal but not all. This is a material storage place. We use metal for construction, welding, and repairs. None of the materials present any environmental concern or danger. The incinerator is used to burn wood and paper. Any residue or ashes is bagged and sent to Yellowknife as garbage. It is included in our annual report for garbage sent to Yellowknife.*

2. 2022 Annual Report Comment:

CIRNAC reviewed the 2021 Annual Report. The 2022 Annual Report was not made available. The water license expired on August 1, 2022.

Recommendation:

(R-02) CIRNAC recommends the 2022 Annual Report be made available as part of the Water Licence 2BL-AWL1722 Renewal Application, and to fulfill Part B Item 2 of the water

Response: We sent the annual 2022 report to your water board department in Oct 2022. Ida Porter was our contact and perhaps she no longer works for you or has moved departments? We received a confirmation from her for having received the report. This seems like just miss-communication or lost email, we will do a better job of following up with your department in the future at the end of the season. Attached is the 2022 report for your convenience.

Response:

3. Water license expired

Comment:

Type "B" Water Licence No. 7BL-AWL1722 expired on August 1, 2022. The licensee has previously operated without a water license.

Recommendation:

(R-03) CIRNAC recommends the licensee clarify if any activities took place on site after August 1, 2022.

Response: *Prior to Covid-19 Ida Porter was our contact at the water board and had dealt with our licenses. Knowing our water permit was going to expire on Aug 2nd, 2022; Nansen Weber contacted Ida Porter and the Gjoa haven water board via email and telephone on several occasions on January 27th 2022 and through Feb 28th, 2022. We never received any response. Additionally we did not receive a response indicating that Ida Porter had changed departments or is no longer working for the waterboard. We realize positions in the water board may have changed during covid in 2020 and 2021. We did our best to reach out and nobody from the department took the time to respond or follow up with a simple courtesy notifying us that our permit was going to expire. It was not our intention to purposely avoid contact with the department, again we have had multiple conversations since 2016 with the department and nobody even bothered to tell us we had outstanding payments for the license. A simple end of season follow up from your department would help operators promptly supply information and yearly feedback and payments on time. Weber Arctic will make sure to have better due diligence on our required permit yearly reports and payments, so this does not happen in the future. We did operate the remaining season of 2022 from Aug 2nd to Aug 24th.*

4. Water flow meter

Comment:

In the 2021 Annual Report, the licensee indicated the water flow meter stopped working in 2021 and would be replaced in summer 2022.

Recommendation: (R-04) CIRNAC recommends the licensee clarify if the water flow meter is operational, and on what date it resumed function.

Response: *Yes a functional water meter was installed and was operating for 2022. We will make sure it is functional prior to season commencing and maintain it during the season.*

5. Quantity of daily water used

Comment:

In the 2021 Annual Report, the actual quantity of water used was reported as an average in cubic meters per day. Type "B" Water Licence No. 7BL-AWL1722 permits a quantity of water not to exceed 5 cubic meters per day.

Recommendation:

(R-05) CIRNAC recommends the licensee specify if the actual quantity of water used exceeded 5 cubic meters on any day, and if so the water license renewal application be adjusted to that volume. Furthermore, CIRNAC recommends that any and all outstanding water use fees be paid prior to the issuance of any renewal water license.

Response: Payment was given to your department to be processed as of Wednesday May 17th, 2023 for the entire outstanding amount on file. It is customary in business to invoice customers and clients for outstanding invoices.

We used an average of 3.07 cubic meters per day in 2022.

6. Spill contingency plan

Comment:

Section 12.0 of the 2023 Spill Contingency Plan states “disposal of soil/substrate or sorbent materials are bagged and shipped to Resolute for disposal.” The plan does not indicate where onsite the impacted materials are stored, and with what secondary containment, until transported offsite.

Recommendation: (R-06) CIRNAC recommends the licensee clarify where materials impacted by a spill will be temporarily stored onsite, and with what secondary containment, until they are transported Offsite.

Response: Disposal of soil/substrate or sorbent materials are bagged or put in a sealed container and shipped to Resolute or Yellowknife for disposal. Contaminated materials that are awaiting transportation are stored in an existing fuel berm. Records of spills and disposal of such to be maintained. (documentation, photos and copy of Nunavut spill Form.)

An updated spill plan is attached.