

**WATER USE INSPECTION REPORT FORM**

Date: 19 July 2013	Licensee Rep. (Name/Title): Allen Kapolak	
Licensee: Boyd Warner - Bathurst Inlet Lodge Ltd.	Licence No.:	7BL-BIL1215

Comments: At the time of the Inspection the only people at the site were Mr. Allen Kapolak and his family. Mr. Kapolak and his brother Sam are the care and maintenance workers for Bathurst Inlet Lodge. Mr. Kapolak advised the Inspector that there had only been two sets of guests so far at the lodge this year and none more were expected for the remainder of the season. The site is comprised of one main lodge with kitchen facilities as well as with a number of outbuildings for guest sleep quarters, a workshop/ storage shack a large generator shack, a church and the personal cabins of a number of folks who reside in Cambridge bay.

WATER SUPPLY

Source(s): Burnside River adjacent to Camp	Quantity used: No accurate recordings
Owner/Operator: Boyd Warner	

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

Intake Facilities: A	Storage Structure: A	Treatment Systems: A	Chemical Storage: None
Flow Meas. Device: U	Conveyance Lines: A	Pumping Stations: U	Screen : A

Comments: Water is pumped into tanks for use by local people from Cambridge bay and by Bathurst Inlet Lodge guests. There are two tanks for the Lodge (One 500 gallon and 1 one thousand gallon). Both of the tanks are shocked with Bleach once annually (Allen Kapolak) and are treated with 250-300 MI of bleach with each fill. Water from the tanks is then fed into the Lodge building and run through a series of filters prior to being dispensed in the main lodge.

The Lodge has only had two sets of guests this year and thus has not been in operation for most of the month of July. No more guests are expected for the rest of the year. (Alan Kapolak)

Water usage is not metered contrary to Part B item 4 of the issued license. The Lodge estimates water usage based on the number of times each tank is filled. However it is unclear if each tank is only filled when empty or on a more regular or daily / weekly basis so usage records are estimates of water usage only. Records for usage (fills) and the addition of bleach were in the maintenance shack and available for review during the Inspection.

Water is pumped from the river via a long hose. The pump and jerry can containing fuel are stored at the river's edge and should be pulled back to a minimum of 30 meters from the water to ensure compliance with the License as issued.

WASTE DISPOSAL

Sewage: Honey bags are deposited / buried on an island across from the lodge. "Garbage Island"

Treatment: (Prim./Sec/Ter.): None

Natural Water Body: NA	Continuous Discharge (land or water): NA	
Seasonal Discharge: NA	Wetlands Treatment: None	Trench: None

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

Discharge Quality: NI	Decant Structure: NA	Erosion: None
Discharge Meas. Device: NA	Dyke Inspection: NI	Seepages: None
Dams, Dykes: A	Freeboard: NA	Spills: Unknown
Construction: NI	O&M Plan: U	A&R Plan: U
Discharge: None	Effluent Discharge Rate: Unknown	

Comments: During the period of the Inspection the Inspector noted as follows;

- As identified in previous inspections the Licensee continues to bury human wastes "honey bags" on the island in front of camp known as "Garbage Island".



- Grey water for each unit is deposited outside each unit. No sumps for the camp were identified during the Inspection.

Solid Waste:

Owner/Operator: Bathurst Lodge Ltd.

Landfill: Garbage Island	Burn & Landfill: U	Other: Garbage Island
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Comments: The Inspector noted the following issues while on site during the Inspection;

- An incinerator is not available on site; waste products are all open burned on the island in front of camp known as "Garbage Island".
- Backhaul records of hazardous and other waste shipped off site are not being kept.
- Contrary to the issued License solid wastes are Land filled on "Garbage Island".
- The Licensee has failed to submit a revised Spill Contingency Plan as required within 60 days of the issuance of the Water License contrary to Part H item 1 of the issued License.
- During the Inspection a number of old batteries, oily and rags and paper products saturated with oil, grease and hydrocarbons were found in the Gen shack room. There were no plans to address the removal of these items from site.

FUEL STORAGE: Bathurst Inlet Lodge and the Government of Nunavut

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

Berms & Liners: None	Water within Berms: NA	Evidence of Leaks: U
Drainage Pipes: NA	Pump Station & Catchments Berm: U	
Pipeline Condition: NA	Condition of Tanks: A	

Comments: During the period of Inspection the inspector noted as follows;

- There are approximately 2000 empty, un-cleaned and uncrushed barrels sitting within 30 ft of the Burnside River contrary to the issued license. There is a very strong odour of fuel coming from these drums and evidence of fuel leaking onto the ground could be seen in a number of locations around the barrels.
- A number of drums bearing the identification letters BIL and Rockgate were found in locations throughout the property. Mr. Kapolak variously identified these as belonging to the lodge and the was able to detail both the origin and contents of the barrels which ranged from P-50 heating fuel, Aviation fuel and gasoline. It was noted that none of these barrels was stored on Secondary Containment.
- Approximately 10 drums of fuel belonging to Air Tindi were found stored at the Airstrip. These also had no Secondary Containment.
- Approximately 250 drums of gasoline were found at the fuel storage area. These barrels apparently were delivered to the Bathurst Inlet lodge for the use of the lodge and for retail to harvesters in the area. These barrels are not on Secondary Containment and stored within 30 ft of the Burnside River contrary to the issued license. These drums are the property of the Petroleum Products Division, Government of Nunavut and are to be relocated to a suitable location. A Letter of Direction will be sent requiring this to be undertaken.
- A large 55,000 l tank was found on site. The tank is registered with Environment Canada and contains approximately 10,000 l of heating fuel that belongs to the Government of Nunavut. The Tank is double walled and has a dispensing hose attached. There is no secondary containment present at the transfer location and the spill/drip tray showed evidence of recent maintenance and spilled fuel. No spill kits were noted on site. The tank was identified as belonging to the Government of Nunavut and used to dispense fuel to the residents of Bathurst inlet. The Fuel distributer for the Government of Nunavut may or may not be Bathurst Inlet Lodge. It was unclear during the Inspection who the responsible party was.



Waste Oil Storage:

None noted during the Inspection. It was noted by Mr. Kapolak that waste fuel and waste oil are used on Garbage Island to get the fire going to burn solid wastes.

SURVEILLANCE NETWORK PROGRAM (SNP)

Samples Collected		Owner /Operator: Bathurst Lodge Ltd. None			
None		AANDC: None			
Signs Posted	SNP: None		Warning: None		
Records & Reporting: No Annual Report was found on the NWB FTP site					
Geotechnical Inspection: None					

Non-Compliance of Act or Licence:

Following the Inspection a review of previous inspection reports and comments received from the Licensee in e-mails to AANDC was undertaken prior to the writing of this report. The following are issues that were identified during that review as well as issues identified during the period of this Inspection;

- As initially identified in the Inspection conducted on July 10th, 2011 the Inspector again found that the Licensee has not undertaken the necessary actions or implemented any measures to prevent the deposit of waste from barreled fuel storage at the site from entering water.
- Over 2000 empty and un-cleaned barrels are stored within 30 ft of water (Burnside River). These drums pose a serious risk of continuing to leak and deposit hydrocarbons (waste) into the river.
- The licensee has failed to comply with Part D item 2 by continuing to practice on site land filling (burying) of waste in Garbage Island.
- The Licensee has failed to comply with Part D Item 4 of the issued License by continuing to open burn wastes at Garbage Island.
- The licensee failed to provide the Inspector, when requested, with a transportation manifest or any other document that can provide evidence of proper disposal of Hazardous wastes (oil filters, batteries etc) generated on site contrary to Part D item 7.
- The Licensee has failed to implement Part D item 8 of the issued License by failing to install sufficient latrines or other such systems a minimum of 31 meters above the ordinary high water mark of any water body.
- The Licensee has failed to implement Part B item 2 (a through f) by not submitting the required Annual Report.

It appears to the Inspector, after having conducted this most recent Inspection and undertaking a review of this file (including e-mail correspondence from the Licensee related to the items contained within the last inspection reports) that recommendations made previously to the Licensee have not been undertaken or have not been implemented with any serious degree of commitment.

Further, after conducting the review of the file the Inspector noted that the licensee has brought forward concerns related to application of the Legislation on “titled lands” as well the integrity of the process, previous inspections and Inspectors. The Licensee is reminded that the “titled lands” referred to in this previous correspondence fall within the boundaries of the Nunavut territory and are subject, like any other to the laws of general application and all Federal and Territorial legislation.

Given the above it is the opinion of the Inspector that further attempts to request compliance and provide guidance through the Inspection process will have little or no positive effect with this licensee.

As such, the Inspector sees no other practical option in this case but to issue an Inspectors Direction (see attached) related to the above instances of non-compliance.



The Licensee is reminded that failure to comply fully or in part with an Inspector's Direction constitutes an offence under subsection 90 (1) of the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and may entail, 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:

A.Keim

Inspector's Name

Sent by E-mail & Registered mail

Inspector's Signature

Cc:

Andrew Keim - Field Operations, AANDC – For filing
Phyllis Beaulieu - Manager Licensing- Nunavut Water Board
Erik Allain - Manager of Field Operations, AANDC

Attachments (1)

Inspector's Direction issued pursuant to Section (87) of the *Nunavut Water and Nunavut Surface Rights Tribunal Act*.

Contact Information:

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