



WATER LICENCE INSPECTION FORM

Original
 Follow-Up Report

Licensee Bathurst Inlet Lodge Ltd.	Licensee Representative Boyd Warner
License No. / Expiry 7BL-BIL1624 (was 7BL-BIL1215)	Representative's Title Owner/Operator
Land / Other Authorizations	Land / Other Authorizations
Date of Inspection 07/07/2016	Inspector Eva Paul
Activities Inspected <input checked="" type="checkbox"/> Camp <input type="checkbox"/> Roads/Hauling	<input type="checkbox"/> Drilling <input type="checkbox"/> Other: <input type="checkbox"/> Mining <input type="checkbox"/> Other: <input type="checkbox"/> Construction <input type="checkbox"/> Other: <input type="checkbox"/> Reclamation <input type="checkbox"/> Fuel Storage

Conditions:	A - Acceptable	C - Concern	U - Unacceptable	NA - Not Applicable	NI - Not Inspected
Water Use	Condition	Comment	Site Conditions	Condition	Comment
Intake/Screen	A		Water Management Structures	A	Storage
Flow Measure. Device	A		Culverts / Bridges	U	5 Spills
Source:	A		Drainage	A	Spill Plan
Water Use:	A	1	Erosion / Sediment	U	5
Recirculation (y /n)	A		Mitigation Measures	A	Administrative
			Reclamation Activities	NA	Records
			Materials Storage	A	Reports
Waste Disposal			Signage	NA	Plans
Waste Water	A	2			Notifications
Solid Waste	A	3	Monitoring		Other
Hazardous Waste	C	4	Sample Collection / Analysis	NA	Direction
					A 8

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

Samples taken by Inspector:	Location(s):
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

SECTION 1	<input checked="" type="checkbox"/> Comments (s.1)	<input checked="" type="checkbox"/> Non-Compliance with Act or Licence (s.2)	<input checked="" type="checkbox"/> Action Required (s.3)
<p>Bathurst Inlet Lodge ("BIL" or "the Lodge") is located on one of very few titled properties in Nunavut ("the property"), owned by Bathurst Inlet Lodge Ltd. ("the Licensee"), within the small, unlicenced community of Bathurst Inlet. As such, BIL is surrounded on all sides by Inuit-owned land (IOL) parcel BB-28, with the exception of a small easement of federal land giving access to the water. The community itself consists of approximately 12 private residences, two bulk fuel storage tanks provided and provisioned by the Government of Nunavut, and an airstrip approximately 600m to the east. It is difficult for regulators to differentiate the activities of the licensee from those of the community and other users of the area. That the community itself is unlicensed/unregulated is a separate but significant issue, in that community members conduct activities (such as disposing of waste on Garbage Island) that contravene the <i>Nunavut Waters and Nunavut Surface Rights Tribunal Act (NWNSRTA)</i>.</p> <p>An inspection to assess BIL's compliance with the water licence was conducted on July 7th, 2016. While the licence, 7BL-BIL1217 was expired at the time of the inspection, all obligations under the licence persist, in accordance with the <i>NWNSRTA</i>. I was also accompanied by Officer Dovreshin MacRae of Environment and Climate Change Canada. Mr. Warner flew to site to participate in the inspection, which was very helpful for delineating the Lodge operations from the community residences, in explaining the history and operation of the site, and to discuss issues and potential solutions. The Lodge was not in operation during the summer of 2016, awaiting licence renewal. The new licence was issued July 28th, 2016, shortly after the inspection took place.</p> <ol style="list-style-type: none"> 1. Water was demonstrated to be drawn from Burnside River, on an as-required basis, and stored in a holding tank. No water was being used at the time of the inspection. 2. Mr. Warner explained that greywater is piped from each building to its respective sump in a nearby willow. All sumps are located >30m from the OHWM. Kitchen grease trap is emptied annually, and grease burned off. A new location for sewage disposal was selected: it will be deposited in the churches' old root cellar, an existing pit, located at N66°50'19.4" W108°02'03.4", within the property boundaries. This existing pit is located >30m from the OHWM, is surrounded by willows, and the downhill side can be built up to ensure sufficient capacity and prevent overflow. 3. Historically, waste was burned on 'Garbage Island', and honey buckets were hauled and emptied there (as may still be the practice of the local residents). This practice has been discontinued by the Lodge. BIL will separate and backhaul non-combustible waste, and any burning of waste will occur within the property, >30m from the OHWM and in such a fashion that no waste will enter water. 4. A pallet of vehicle batteries was noted at the airstrip. These may not be from BIL, as the community and air service providers generate waste also. 5. The trail from BIL (and the community) to the airstrip passes through a wetland and a small creek. Equipment is driven over this trail. Rutting has resulted through the wetland, and there may be sediment being deposited in the creek and into the river as a result of activity. While it is understood that this activity is not limited to BIL, efforts should be made to re-route this trail onto higher, stable ground away from the wet lowlands. 			



6. No obvious provisions are made to prevent spills at the generator shack: tanks are single-walled and no containment is provided beneath them, although a spill kit is present. While quantities of fuel stored by BIL are small enough not to trigger storage tank regulations, a spill in this remote location would be costly and difficult to remedy. No spill kit or drip tray were visible at the river where re-fuelling of the float plane was taking place. The air strip is on Inuit Owned Land. BIL and other operators (such as Air Tlndi) store fuel in reasonable quantities. I noted approximately 18 drums (mix of diesel, avgas, and jet) that were marked BIL at the time of the inspection. I did not see a spill kit, but Mr. Warner indicates that one is present. The bulk fuel tanks are located up-slope of BIL, and I would encourage BIL to insist that PPD and community members take all reasonable precautions to prevent contamination that may impact BIL property or that may enter water by any means.
7. No annual report is available on the public registry for 2015. Mr. Warner informed me that the lodge operated for 2 weeks in 2015.
8. Having reviewed the conditions at Bathurst Inlet Lodge, as well as the documents submitted for renewal of this licence and BIL's proposed waste management practices, I am of the belief that the terms of the Direction issued by Inspector Andrew Keim (August 26th 2013 / revised October 27th, 2014) have been substantially satisfied.

SECTION 2	<input type="checkbox"/> Comments	<input checked="" type="checkbox"/> Non-Compliance with Act or Licence	<input type="checkbox"/> Action Required
<i>7BL-BIL 1215 (in force at time of inspection)</i>			
B.2: failure to file 2015 annual report.			
C.5: erosion of stream banks and rutting within a wetland.			
C.6: failure to implement adequate sediment and erosion control.			
H.2/3: failure to implement adequate spill prevention and mitigation measures.			
SECTION 3	<input type="checkbox"/> Comments	<input type="checkbox"/> Non-Compliance with Act or Licence	<input checked="" type="checkbox"/> Action Required
1. Please ensure that during operations, all water drawn from source is recorded on a daily basis. 2015 Annual Report is to be submitted by October 15, 2016 and copied to the Inspector. If the Lodge does not operate in a given year, please submit a report for the public registry indicating such (including 2016).			
2. As discussed during the inspection, absolutely no waste is to be deposited on Garbage Island. The river delta would fall under several federal Acts, and no authorization would be given for this activity. Any recoverable waste left there by BIL historically should be removed and handled according to the licence conditions. BIL will separate and backhaul non-combustible waste, and any burning will occur within the property, >30m from the OHWM and in such a fashion that no resulting wastes will enter water.			
3. All hazardous and non-combustible waste generated by BIL is to be backhauled as per the licence. Records of disposal with a licenced facility are to be maintained and provided at the request of the Inspector. If the Licensee contemplates taking any waste to a community within Nunavut, this constitutes a modification (from proposed practices) as per Part F of the licence. In general, authorization from the hamlet is first required to be submitted to the Board.			
4. Ensure that all fuel stored at BIL and for BIL (at the airstrip) are >30m from the OHWM and stored within secondary containment or a surface liner as per G.4 of the new licence.			
5. The new licence includes provisions regarding rutting and gouging. Use of the lowland trail (by BIL) to the airstrip is to be discontinued and a trail on higher dry ground established.			

Licensee or Representative	Inspector's Name
-	Eva Paul
Signature	Signature
-	<i>Sent electronically</i>
Date	Date
-	21-09-2016

Office Use Only: Follow-up report to be issued by Inspector	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
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CC: Licensing Department, NWB
Erik Allain, Manager of Field Operations, INAC
Lands Department, Kitikmeot Inuit Association



PHOTO LOG



Description: Aerial view of Bathurst Inlet Lodge and community houses closest to the water. Bulk fuel storage is off the left of the photo.



Description: Barrels and garbage seen on Garbage Island.



Photo Log # 3

Photo DSC05718

Location (NAD 83 DD MM SS.SS)

N66 50 14.7

W108 01 00.7



Description: Pallet of batteries located at the airstrip.

Photo Log # 4

Photo DSC05712

Location (NAD 83 DD MM SS.SS)

N unrecorded

W



Description: Trail to the airstrip; passes through marshy lowland areas.



Photo Log # 5

Photo DSC05671

Location (NAD 83 DD MM SS.SS)

N66 50 14.7

W108 00 38.8 (*in motion*)



Description: Airstrip, fuel storage, and boats/barges. To the top of the photo, the trail passes through a small creek.

Photo Log # 6

Photo DSC05686

Location (NAD 83 DD MM SS.SS)

N66 50 19.3

W108 01 54.8



Description: Generator shack with single-walled tanks. Barrels of diesel awaiting use.



Photo Log # 7

Photo DSC05702

Location (NAD 83 DD MM SS.SS)

N66 50 18.0

W108 02 07.7



Description: Mr. Warner indicates he was in the process of fueling his plane when we arrived. Barrel is for immediate use. No spill kit noted.