



WATER LICENCE INSPECTION FORM

☒ Original
☐ Follow-Up Report

Licensee		Licensee Representative	
Plummer's Arctic Lodges		Chuk Coulter	
Licence No. / Expiry		Representative's Title	
Unlicensed			
Land / Other Authorizations		Land / Other Authorizations	
Date of Inspection		Inspector	
07/07/2016		Eva Paul	
Activities Inspected			
<input checked="" type="checkbox"/> Camp	<input type="checkbox"/> Drilling	<input type="checkbox"/> Mining	<input type="checkbox"/> Construction
<input type="checkbox"/> Roads/Hauling	<input type="checkbox"/> Other:	<input type="checkbox"/> Reclamation	<input checked="" 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	Haz/Mat Management		Condition	Comment
Intake/Screen	A			Water Management Structures		A		Storage		U	5
Flow Measure. Device	A			Culverts / Bridges		NA		Spills		A	
Source:	A			Drainage		A		Spill Plan		NA	
Water Use:	U	1		Erosion / Sediment		C	4				
Recirculation (y /n)	A			Mitigation Measures		C	4	Administrative			
				Reclamation Activities		NA		Records		NA	
				Materials Storage		A		Reports		NA	
Waste Disposal				Signage		NA		Plans		NA	
Waste Water	U	2						Notifications		NA	
Solid Waste	C	3		Monitoring				Other			
Hazardous Waste	A			Sample Collection / Analysis		NA					
*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>Tree River Lodge "the Lodge" is a small outpost camp belonging to Plummer's Arctic Lodges located at N67°38'08" W111°54'07" on the Tree River, approximately 8 km up-river of the Coronation Gulf, and is accessed by air. Float planes can land on the river, and there is an airstrip also at N67°38'25.9 W111°53'12.5. The Lodge is on Inuit Owned Land parcel CO-33. The Lodge is comprised of 4-5 guest cabins, a kitchen building, the outfitting building, generator shack, outhouses, and several small out-buildings. The facility has reportedly existed for 60+ years. Prior to the creation of Nunavut the Lodge fell under NWT legislation and no licence was required for use of water/deposit of waste under 50 m³ per day. However, since the creation of Nunavut, the <i>Nunavut Land Claims Agreement</i>, and the <i>Nunavut Waters and Nunavut Surface Rights Tribunal Act</i> ("the Act"), all uses of water for commercial purposes require the approval of the Nunavut Water Board. I was made aware of the Lodge's existence in May of 2016. I notified Mr. Chuk Coulter (Plummer's) of the regulatory requirement for a water licence or approval of the Nunavut Water Board (NWB), and that I would conduct an inspection early in the field season. I have found documentation since my initial discussions with Mr. Coulter that indicates that Plummer's was notified in 2009 by the NWB that a licence was required (see attached).</p> <p>I attended site on July 7 2016, accompanied by Officer Dovreshin MacRae of Environment and Climate Change Canada. We were met on-site by Chris Kulas, Camp Manager. Water use and waste disposal facilities were inspected, as well as fuel and hazardous materials management practices.</p> <ol style="list-style-type: none">Water use is currently unauthorized. Water intake was found to be sufficient, with the end of hose screened to prevent impingement of fish. Water is pumped up to a 325 gallon tank above the camp, and water is gravity fed to the facilities.The kitchen greywater system consists of a sump with a float system which pumps the greywater through a line to a depression away from the river. The sump, however, is located directly beside the river (less than 5m) and has overflowed [Photos 4 + 5].It was indicated that food waste is "composted" on the land as the old incinerator is not in use. The location that was indicated, across the river from the Lodge, is on Crown Land.There is an esker-like sandy plateau between two carved channels that is used as a road for access from the river to the airstrip [Photo 2]. Over time, traffic on the plateau has stripped vegetation from the surface. While some natural sloughing is expected from this kind of formation, some sediment movement is also happening because of the lack of vegetation. It is not unusual for the permafrost to recede from such formations, which can result in major slumps, shifts, or cracks [Photo 6]. There is a piece of equipment in the south drainage of this plateau that looks like it is being buried [Photo 7].When I arrived at site, approximately 30 empty fuel barrels were stored on the steeply sloped bank near the float plane dock [Photo 1]. There were 7 large propane tanks also present on the river bank [Photo 7]. Mr. Kulas was made aware that materials were not to be stored within 30m of the Ordinary High Water Mark (OHWM) of the river and he moved the barrels promptly. 3 full barrels were stored farther up-slope. No spill kit was noted. At the Lodge, small quantities of oil and fuel for the boats are stored in trays within a supply shed, which was being cleaned and organized at the time of the inspection. A spill kit was noted in the generator shack.			



SECTION 2

☐ Comments

☒ Non-Compliance with Act or Licence

☐ Action Required

Unlicensed use of water and deposit of waste, contrary to the *Nunavut Waters and Nunavut Surface Rights Tribunal Act*:

11 (1) Subject to subsection (2), no person shall use, or permit the use of, waters in Nunavut except in accordance with the conditions of a licence.

12 (1) Subject to subsection (2) and except in accordance with the conditions of a licence, no person shall deposit or permit the deposit of waste (a) in waters in Nunavut; or (b) in any other place in Nunavut under conditions in which the waste, or any other waste that results from the deposit of that waste, may enter waters in Nunavut.

90 (1) Every person is guilty of an offence who contravenes subsection 11(1), section 12 or section 88 or who fails to comply with subsection 11(3) or with a direction given by an inspector under subsection 87(1).

90.3 An offence under subsection 90(1), 90.1(1) or 90.2(1) that is committed or continued on more than one day constitutes a separate offence for each day on which it is committed or continued.

SECTION 3

☐ Comments

☐ Non-Compliance with Act or Licence

☒ Action Required

A. A Water Licence (WL) or Approval Without a Licence (AWL) from the NWB must be obtained before Tree River Lodge may resume operation in 2017. My understanding is that Mr. Coulter has begun the process to obtain an AWL.

Assuming approval is obtained:

B. Daily water use must be recorded. A meter is preferred (measured at the pump); however, it is acceptable to record tank-refills as long as the tank volume is clearly marked and monitored. Daily records may be requested by the inspector (in the case of an AWL), or are submitted with the annual report (WL only).

C. Waste may only be deposited in the manner and quantity that is approved by the Board. In the case of an AWL, the only waste that may be deposited is human waste (sewage and greywater). Alternative measures for food waste will be required (incineration or backhaul). Should Plummer’s wish to continue depositing food waste, it will require a type ‘B’ water licence.

D. Upon return to Tree River, the greywater sump must be re-located >30m from the OHWM of the river and managed to ensure that no greywater can enter water. Sump/disposal location(s) are to be recorded by GPS. Confirmation this has been carried out is to be confirmed with the Inspector in writing by **July 31, 2017**.

E. Immediate removal of the piece of equipment at risk of burial beside the river. Confirmation this has been carried out is to be confirmed with the Inspector in writing by **July 31, 2017**. When using the ‘road’, efforts should be made to preserve the remaining vegetation and prevent further man-made impacts that result in sediment deposition.

F. Extreme caution should be used for storage of all fuel, empty barrels, and other equipment on the plateau. Storage should be well away (>100m) from the OHWM of the river in case of a shift or collapse of the plateau. All fuel and lubricants at camp should be stored >30m from the OHWM and within drip trays/containment.

G. Spill kits must be present at all fuel transfer areas, and particularly at the river where boats and float planes are re-fueled. These kits must be well equipped for spills to the water and staff fully trained in appropriate spill response measures.

Licensee or Representative	Inspector’s Name
	Eva Paul
Signature	Signature
	Sent electronically
Date	Date
	27/9/2016

Office Use Only:

Follow-up report to be issued by Inspector

☐ Yes ☒ No

CC: Licensing Department, NWB
Kitikmeot Inuit Association
Erik Allain, Manager of Field Operations, INAC

Att: 1. Photo Log
2. 090908 Tree River Operating without license-OMLE (2009 Letter from NWB)



PHOTO LOG

Date	Camera	Inspector	Authorization
July 7, 2016	SONY DSC-HX50V	Eva Paul	Unlicenced
Photo Log # 1		Location (NAD 83 DD MM SS.SS)	
Photo DSC05859		N67 38 03	W111 54 08 (<i>in motion</i>)



Description: Aerial view of Tree River Lodge looking approximately North. The grey shed with fuels and lubricants shows to the right of the boats, and the generator shack is the building to the bottom right. The kitchen shows above the boats, with the sump to the left of it. The white-roofed structures are the guest cabins, and the outhouses are to the top right. The old incinerator appears to the far right.

Photo Log # 2	Location (NAD 83 DD MM SS.SS)
Photo DSC05851	N67 38 45 W111 54 12 (<i>in motion</i>)



Description: Float plane dock. Barrels to the toe of the slope were empties; 3 full barrels farther up-slope near the equipment.



Photo Log # 3

Photo DSC05842

Location (NAD 83 DD MM SS.SS)

N67 38 57

W111 52 21 (*in motion*)



Description: Airstrip and road, looking approximately west. 11 full barrels belonging to Water Survey Canada were noted.

Photo Log # 4

Photo DSC05889

Location (NAD 83 DD MM SS.SS)

N67 38 09.5

W111 54 11.4



Description: Kitchen sump; proximal to the river.



Photo Log # 5

Photo DSC05887

Location (NAD 83 DD MM SS.SS)

N

W



Description: Kitchen sump, with overflowed material in the grass due to a pump malfunction.

Photo Log # 6

Photo DSC05915

Location (NAD 83 DD MM SS.SS)

N67 38 34.7

W111 53 56.1



Description: Slumping of sand from the south side of the road leading to the airstrip.



Photo Log # 7

Photo DSC05853

Location (NAD 83 DD MM SS.SS)

N

W



Description: Same slope, seen from the south. Note equipment in the ‘ravine’ that must be removed before it is buried. Also note propane tanks near the river bank.