

**From:** [Andrea Cull](#)  
**To:** [licensing](#)  
**Subject:** DND SITES  
**Date:** Thursday, September 03, 2009 12:21:40 PM

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\*\* Sorry please disregard that last email.. i made a mistake in it.....  
please accept this email:

Andrew and Kevin are back in the office now.. they got back today....  
SO a final letter should come shortly.

I was just talking to Andrew and he said that he has all of the inspection reports done up from 5 out of 6 sites... he didn't make it to 3BC-BAF0411. So I made a change in my draft email.. so I am going to reattach it to this message(see below). But Andrew also told me that he is going to check to make sure he sent them all to the NWB and if he didn't you well get them shortly.

Re: DRAFT : Type "B" Water Licence Renewals, Department of National Defence (DND): 3BC-BAF0409 - Brevoort Island Project (BAF-3), 3BC-FOD0409 - Dewar Lakes Project (FOX-3), 3BC-SHE0409 - Shepherd Bay Project (CAM-3), 3BC-DYE0409 - Cape Dyer Project (DYE-M), 3BC-CAM0409 - Cambridge Bay Project (CAM-M), 3BC-FOH0409 - Hall Beach Project (FOX-H)

Water licence #3BC-BAF0409, 3BC-FOD0409, 3BC-SHE0409 and 3BC-DYE0409 were all due to expire Feb 28, 2009. DND submitted four amendment applications to the NWB on Feb 11, 2009 requesting that the water licenses be extended for a period of six months to allow work to continue on site and provide such time that Nasittuq Corporation to issue new water licenses. At that time, DND intended to apply to cancel their licenses. Now Nasittuq Corporation is not taking over these projects and DND is now applying for new water Licence renewals.

The existing water licenses #3BC-CAM0409 in place of the CAM-M site and 3BC-FOH0409 in place for the FOX-M site are issued to DND and was set to expire on June 30, 2009. Nasittuq has applied for a new licence as operator of the site (contracted by DND). DND was going to cancel their licence upon issuance of the new licence by Nasittuq. But now Nasittuq Corporation is not taking over these projects and DND is now applying for new water Licence renewals.

All of the above mentioned water licence renewal applications were submitted by DND was received on July 30, 2009 by the Nunavut Water Board.

As a result of this review INAC recommends that the Nunavut Water Board impose all of the comments/recommendations that were submitted by INAC between the dates of Feb 24 and March 4, 2009 on the above mentioned projects (please see these 6 attached letters) when Nasittuq Corporation was applying for a new water licence.

INAC also recommends that the NWB impose applicable standard conditions from the existing water licence #3BC-BAF0409, 3BC-FOD0409, 3BC-SHE0409, 3BC-DYE0409, 3BC-CAM0409 and 3BC-FOH0409. In addition the following comments/recommendations are provided for your consideration in the licence approval process.

Recommendations/Comments:

Re: Water licence #3BC-BAF0409, 3BC-FOD0409, 3BC-SHE0409 and 3BC-DYE0409

Sewage Disposal:

In INAC's 2008 inspection report for 3BC-BAF0409 it was brought to INAC's attention that this site do not have a sewage lagoon or any waste treatment being used on site. INAC could not perform an inspection in 2009.

As written in the 2008 inspection report for 3BC-BAF0409: Contrary to issued license, Human wastes are macerated and discharged directly to environment via discharge pipe. No Lagoon or sump is present on site.

During 2009 site inspections of 3BC-FOD0409, 3BC-SHE0409 and 3BC-DYE0409 by an INAC Water Resources Officer, it was brought to INAC's attention that these sites do not have sewage lagoons or any waste treatment being used on site.

As written in the 2009 inspection reports: Human wastes are not treated; rather they are discharged directly to the environment via an outfall pipe contrary to the existing licence. Previously the Inspector required that the Licensee comply with the terms of the existing licence. This issue is to be addressed prior to the period of the next inspection or enforcement actions will be undertaken under the Act.

Part D, Item 5, of the existing water licenses (3BC-BAF0409, 3BC-FOD0409, 3BC-SHE0409 and 3BC-DYE0409) requires that the Licensee shall manage all sewage through the use of Incinolet toilets, and dispose of all resulting ash in the approved on-site landfill facility. This appears to be a violation of Section 12 of the Nunavut Waters and Nunavut Surface Rights Tribunal Act (NWNSTRA), it is unacceptable without treatment. INAC would like to recommend that the NWB require a Compliance Plan with firm dates of implementation. The Plan at a minimum should include the installation of an appropriate sewage treatment system for both greywater and blackwater, an estimate of the amount of total wastewater generated at the site, restoration/clean-up of areas where raw sewage has been deposited, and an acceptable interim treatment system (portable, holding tanks, etc). The Plan should be submitted 30 days after renewal.

>>> licensing <licensing@nunavutwaterboard.org> 9/3/2009 1:38 PM >>>

Good morning - another question for you. We have only received 1 inspection report for these 6 sites (3BC-FOD0409) dated August 20, 2009.

Would you happen to know if there are other reports generated by INAC that we review in drafting the licenses?

Regards,

Phyllis Beaulieu  
Manager of Licensing

Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NU X0B 1J0  
Phone: (867) 360-6338, Ext. 26  
Fax: (867) 360-6369  
Email: [licensing@nunavutwaterboard.org](mailto:licensing@nunavutwaterboard.org)

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Gjoa Haven, NU X0B 1J0  
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Fax: (867) 360-6369  
Email: [licensing@nunavutwaterboard.org](mailto:licensing@nunavutwaterboard.org)