

From: avativut nunavut [avativutnunavut@gmail.com]
Sent: Saturday, May 30, 2009 3:16 PM
To: Richard Dwyer
Subject: Re: Regulation of Phenols in Wastewater Request for comments

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Dear Richard,

I would like to make the following comments:

The argument in this paper is deeply flawed. The paper argues, contrary to the many effluent wastewater standards across Canada that there is no numerical criteria "applicable" to DEW line cleanups for phenols.

Nunavummiut have a right to expect that DEW line "cleanups" will not discharge phenols into the environment at concentrations that would be unacceptable in other places in Canada. The entire approach of this paper should be rejected. Nunavut is not a phenol dumping ground. Phenols are a regulated toxic substance and should be disposed of properly, no matter where the project is located and no matter whether they speculate that the impact on the aquatic environment will be acceptable.

This paper is not a site specific risk assessment, it contains no site specific environmental analysis or data to justify its speculation about the supposed "minimal" risks to the aquatic environment of violating CCME standards for phenols in wastewater.

For example the paper argues that because the phenols are discharged onto land, they are not discharged into a water body and so the water body standards do not apply. This is ludicrous. There is no information about the distance from any water body or the potential for impacts on the water body. If the effluent is discharged onto ice in the winter or will sit on an icy surface over winter, there is no information justifying not treating this as a "body of water" for the purposes of effluent standards.

This paper uses a methodology unknown to environmental management. It is a site specific risk assessment that does not discuss the site in question.

I hope that the NWB will

- a) consult all affected communities about phenols and phenol standards; and
- b) get a peer review of this document; and
- c) hold a public hearing with well-publicized dates and times and in Inuktitut

before it considers the approach suggested in this document

thank you

Alice Baker

Friends of the Environment Nunavut
<http://avativutnunavut.blogspot.com>

On Fri, May 29, 2009 at 6:04 PM, Richard Dwyer <licensingadmin@nunavutwaterboard.org> wrote:

Good afternoon;

Please see attached requesting review and comments; deadline for comments June 29, 2009

Regards,

Richard Dwyer

Licensing Administrator

Nunavut Water Board

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